1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 UNITED STATES OF AMERICA, Case No.: 4 Plaintiff, 2: 23-CR-00222-RFB-NJK 5 VS. 6 FEREIDOUN KHALILIAN, Defendant. 7 8 9 **DECLARATION OF SARA VARGAS** 10 I, <u>Sara Vargas</u>, declare as follows: 11 1. I am a Special Assistant United States Attorney Special assigned to <u>United States v.</u> 12 Khalilian, CR No. 23-CR-00222-RFB-NJK. I have knowledge of the facts set forth herein and 13 could and would testify to those facts fully and truthfully if called and sworn as a witness. 14 2. Based on my discussions with Assistant United States Attorney Robert Knief, who was 15 present at Mr. Khalilian's post-indictment arraignment on November 28, 2023, and from the 16 context of my discussions with Deputy Federal Public Defender Jonathan Aminoff, of the 17 Central District of California, I understand that Mr. Khalilian requested to defer his detention hearing to a later date, when his previously appointed counsel, Deputy Federal Public 18 19 Defenders Jonathan Aminoff and Adam Olin, were authorized to appear in the District of 20 Nevada. 21 3. Attached hereto as Exhibit A is a true and correct copy of a recording from March 8, 22 2023 containing defendant's voice. 23 4. Attached hereto as Exhibit B is a true and correct copy of a recording from March 8, 24 2023 containing defendant's voice.

1 5. I have reviewed a file called "_chat," produced to the defense as Bates numbers 2 USAO_002765-69. In that chat transcript between Mr. Khalilian and Michael Sherwood, defendant wrote on March 11, 2023, at 1:53:26 p.m., "He just canceled the rest of. Y [sic] credit 3 4 cards I have to go meet a friend in Paris and borrow money." 5 6. Attached hereto as Exhibit C is a true and correct copy of a photograph depicting a 6 WhatsApp message that defendant sent to Mr. Sherwood on March 9, 2023, produced as Bates 7 number USAO_002658. 8 7. Attached hereto as Exhibit D is a true and correct copy of a photograph depicting a 9 WhatsApp call log between Mr. Khalilian and Mr. Sherwood on March 16, 2023. 10 8. Attached hereto as Exhibit E is a true and correct copy of a WhatsApp conversation 11 between Mr. Khalilian and Mr. Sherwood on March 16, 2023. 12 9. Attached hereto as Exhibit F is a true and correct copy of a WhatsApp conversation 13 between Mr. Khalilian and Mr. Sherwood on March 17, 2023, produced as Bates number 14 USAO_002674. 15 10. Attached hereto as Exhibits G and H are true and correct copies of records showing 16 CashApp payments Mr. Khalilian sent to Mr. Sherwood on March 17, 2023. 17 11. Attached hereto as Exhibit I is a true and correct copy of a recording from March 23, 18 2023 containing Mr. Khalilian's voice. 19 12. Attached hereto as Exhibit J is a true and correct copy of a receipt showing a Zelle 20 payment from Mr. Khalilian's company on March 23, 2023. 21 13. Attached hereto as Exhibit K is a true and correct copy of a recording from March 28, 22 2023 containing Mr. Khalilian's voice. 23 14. Attached hereto as Exhibit L is a true and correct copy of a recording from June 21, 24 2023 containing Mr. Khalilian's voice.

2023 containing Mr. Khalilian's likeness and voice.

1

15. Attached hereto as Exhibit M is a true and correct copy of a recording from June 21,

3	16. Based on my discussions with FBI Special Agent Ramel Moore, I know that Mr.		
4	Khalilian had two SIM cards on one of the phones seized at his arrest. On the SIM card for the		
5	phone number Mr. Khalilian used (ending in -6161), Mr. Khalilian's WhatsApp conversations		
6	with Mr. Sherwood had been erased. On the SIM card for the other number on that same cell		
7	phone (ending in -9305), Mr. Khalilian's WhatsApp conversations still existed.		
8	17. Attached hereto as Exhibit N is a true and correct copy of a recording of a conversation		
9	between Mr. Sherwood and Tyson James.		
10	18. Attached hereto as Exhibit O is a true and correct copy of a recording of a conversation		
11	between Mr. Sherwood, Mr. James, and Homayun Khalilian.		
12	19. Attached hereto as Exhibit P is a true and correct copy of a recording of a conversation		
13	between Mr. Sherwood, Mr. James, and an FBI Undercover Agent.		
14	20. Attached hereto as Exhibit Q is a true and correct copy of a recording of a conversation		
15	between Mr. Khalilian and Michael Halperin. The relevant discussion begins at approximately		
16	6:56.		
17	21. Attached hereto as Exhibits R, S, T, U, V, and W are excerpts from the Cellebrite		
18	download of one of the cell phones seized at Mr. Khalilian's arrest and searched pursuant to a		
19	federal warrant.		
20	22. I have viewed an approximately ten-minute sizzle reel containing excerpts of		
21	interviews of former associates and employees of defendant. In that recording, which was		
22	produced to the defense as USAO_005592, I am aware of the following about the recording:		
23	a. Noel Lee, founder and president of Monster Products Inc., said that defendant		
24	said there was a woman "who accused him of rape that ended up in a box in a bunch of		
l			

1	pieces."		
2	b.	Myles Kennedy, defendant's former employee, recalled defendant saying "he had	
3	hired three men to intimidate her and that's all they were supposed to do according to him but		
4	apparently when they went to intimidate her, she cut one of them with a knife and they ended		
5	up killing her and cutting up the pieces, according to Fred. And then Fred claimed to have		
6	been interviewed by the FBI about this because the order didn't come from him so therefore, it		
7	had nothing to do with him."		
8	23.	Attached as Exhibit X is a true and correct copy of Notice of Court Hearing,	
9	Temporary Restraining Order, and witness statements, filed on or about July 27, 2018.		
10	24.	Attached as Exhibit Y are true and correct copies of WhatsApp messages that	
11	defendant and his staff exchanged on or about May 23 and 24, 2023.		
12	I declare under penalty of perjury under the laws of the United States of America that		
13	the foregoing is true and correct and that this declaration is executed at Los Angeles,		
14	California, on December 19, 2023.		
15			
16	SARA YARCAS		
17		SARA VARGAS	
18			
19			
20			
21			
22			
23			
24			

Exhibit A

Audio File



Exhibit B

Audio File



Exhibit C

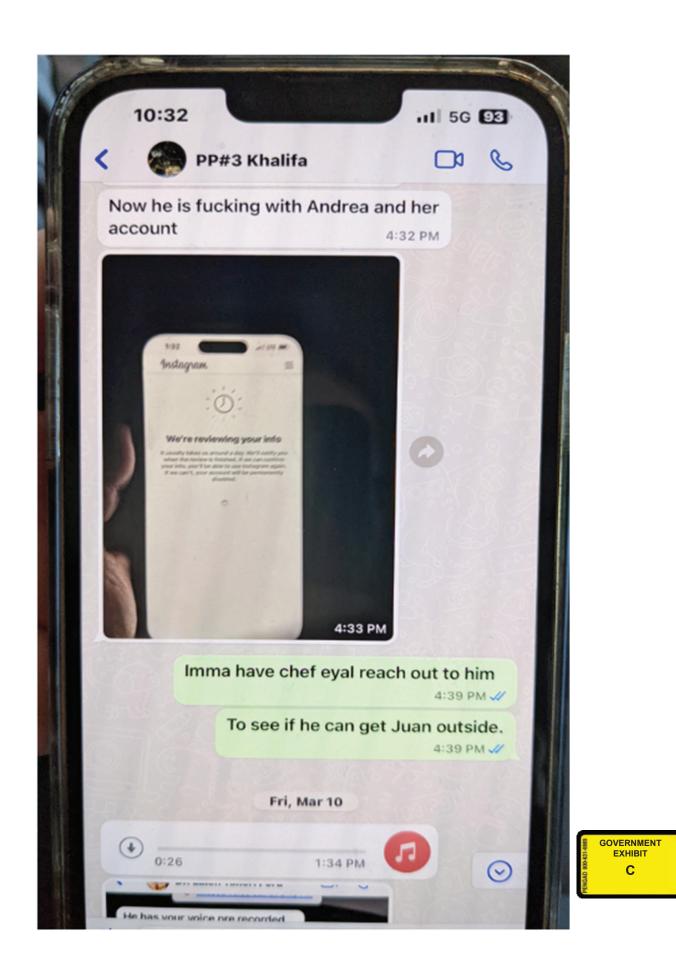


Exhibit D

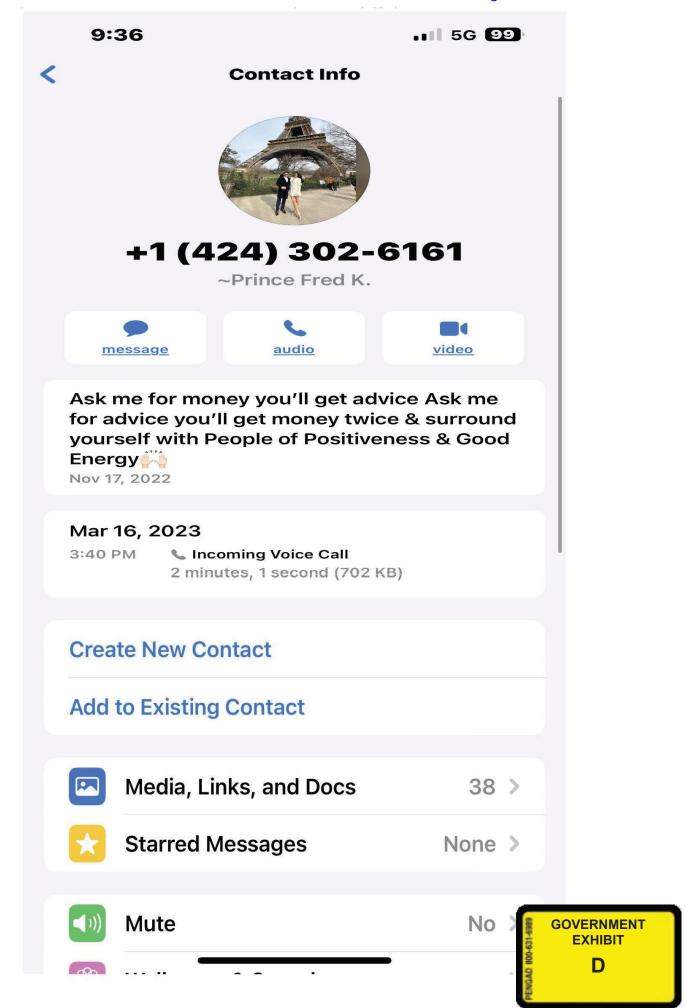
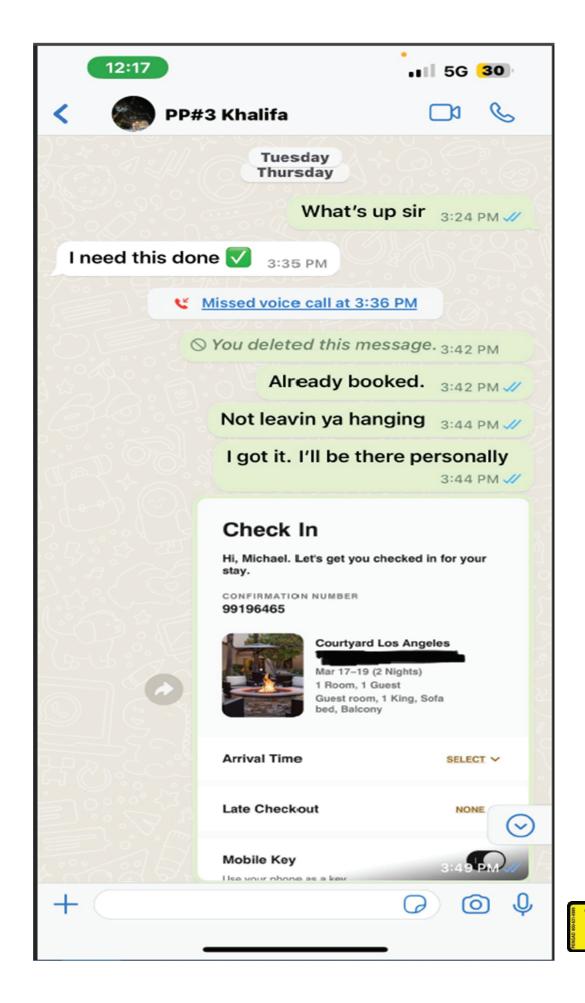


Exhibit E



Ε

Exhibit F

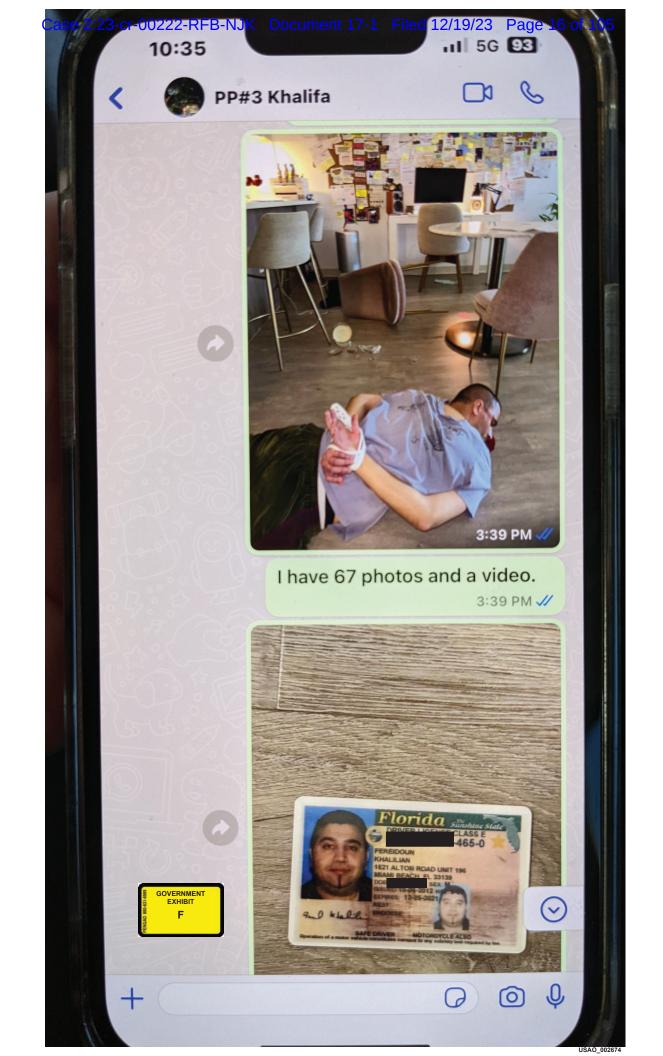


Exhibit G

acash.app



Prince Fred Khalifa

Payment from \$PrinceFredKhalifa

\$3,000.00

For my guys. Friday at 3:39 PM



Received

Amount \$3,000.00

Destination Cash

Identifier #DKHQP2F

To Michael Sherwood

From Prince Fred Khalifa

GOVERNMENT EXHIBIT

G

Exhibit H



Prince Fred Khalifa

Payment from \$PrinceFredKhalifa

\$3,500.00

Friday at 9:31 PM



Amount \$3,500.00

Destination Cash

Identifier #70GQEKD

To Michael Sherwood

From Prince Fred Khalifa

GOVERNMENT EXHIBIT

Exhibit I

EXHIBIT 3-A

Recording: ZOOM0007.MP3 Timestamps: 1:29-2:12

Date: March 23, 2023, 10:27 a.m.

Participants: Michael Sherwood ("SHERWOOD")

Fereidoun Khalilian ("DEFENDANT")

SPEAKER	TRANSCRIPTION
SHERWOOD	Hey, those guys, the ones we sent the first payment to, for Juan's, like, you know, Juan's thing. The ones that took out Juan. Basically, so they got rid of his body, you know, the ones that killed him. They basically, they're asking for another thousand. So, I'm wondering if you would—that account for right now, the one that I sent you—
DEFENDANT	No problem.
SHERWOOD	Can you send me—
DEFENDANT	Do it through CashApp or through Zelle?
SHERWOOD	If you could Zelle the account I sent you yesterday, I'm just going to take it out of the business account so it doesn't look weird. And I'm gonna give it to them so we can just be done with them.
DEFENDANT	How much you want me to send?
SHERWOOD	If you could just send them a thousand, each. There was only three of them.
DEFENDANT	Ok I'll send it right now.

Exhibit J





Business Checking - 4982

Transaction Details

ZELLE CREDIT
PAY ID BACic4muqdok ORG ID BAC NAME HOLLYWOO

Amount

\$4,000.00

Posted

Posted On

Mar 23, 2023

Transaction Type

Deposit

Notice: Account activity is provided for your information only and is subject to revisions. It is not a substitute for your periodic statement, which is the official record of your account.





Exhibit K

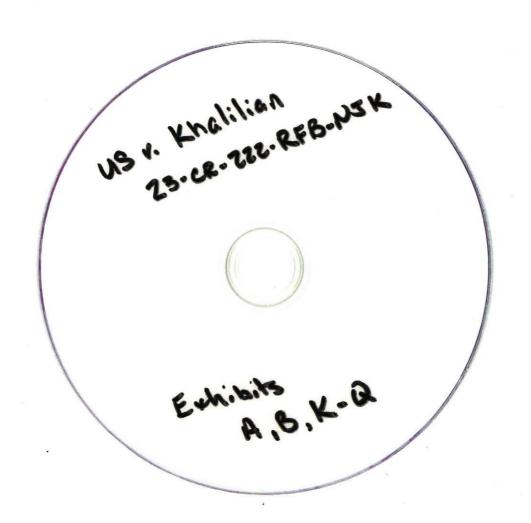


Exhibit L

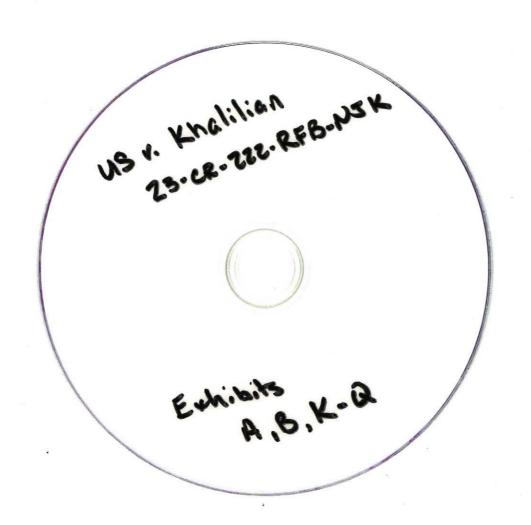


Exhibit M

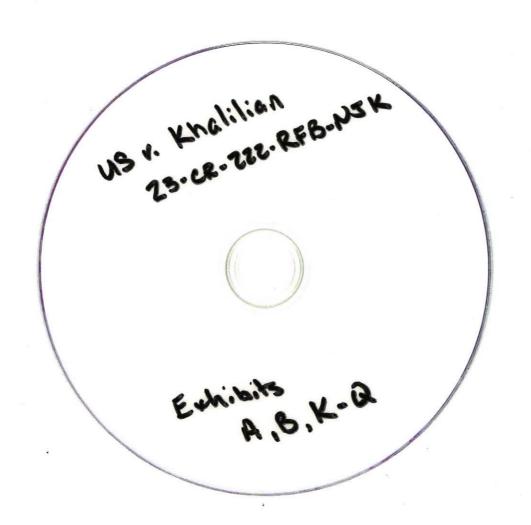


Exhibit N



Exhibit O

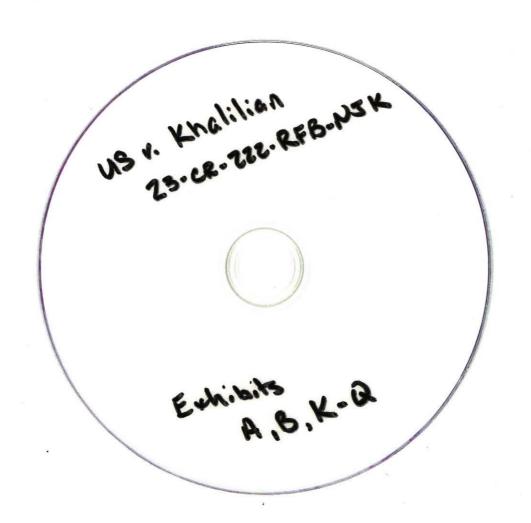


Exhibit P

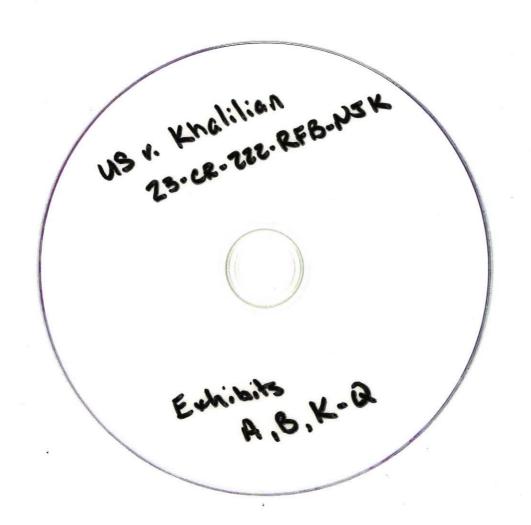


Exhibit Q

AUDIO FILE

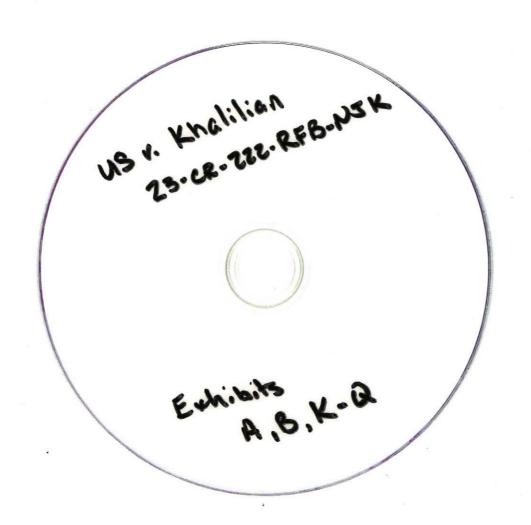


Exhibit R

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 40 of 105

From: 14243026161@s.whatsapp.net Fbi International

Check on the status see how they're doing with the couch with the rocks before I get on the phone. Ask him if he has a temporary U-shaped college that we can use for tomorrow night the generals coming here for dinner I'm embarrassed.

Status: Read Platform: Mobile

5/31/2023 7:24:07 PM(UTC+0)

Fibnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29FDE2A (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

my lord, can we call him now?

Status: Read Platform: Mobile

5/31/2023 7:54:24 PM(UTC+0)

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite : 0x29FEF94 (Table: ZWAMESSAGE; Size: 84033536 bytes)

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

Any update first?

Status: Read Platform: Mobile

5/31/2023 7:56:32 PM(UTC+0)

Source Info: iPhone

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite : 0x29FEF01 (Table: ZWAMESSAGE; Size: 84033536 bytes)

. (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

my lord at the moment they do not have some furniture that they are ready to send him but they could send him their own furniture and send them even right now and I will be you would have dinner with the general and the furniture they would pick up again on Friday morning That is the option they have at the moment since they do not have more furniture available

Status: Read Platform: Mobile

5/31/2023 7:58:43 PM(UTC+0)

Source IIII.

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29FEBD2 (Table: ZWAMESSAGE; Size: 84033536 bytes)

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)



Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 41 of 105

From: System Message System Message

Prince Fred K. (16504073547@s.whatsapp.net owner) started a video call

Platform: Mobile Label: System

5/31/2023 8:02:42 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29FEA69 (Table: ZWAMESSAGE; Size: 84033536 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573134898040@s.whatsapp.net Julio Salazar
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 14243026161@s.whatsapp.net Fbi International
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Mauricio get some leads from him of some furniture stores that you can go to that I can buy temporary furniture have a delivered tonight or tomorrow morning and then when I'm done using it either use it in my new office or somewhere else are you gonna need a U-shaped couch or a couch sofa, and a chair just to make it a nice area something classic so go to several furniture stores, see if anything catches your eyes that I would like

Participant	Delivered	Read	Played
573134898040@s.whatsapp.net Julio Salazar	5/31/2023 8:07:37 PM(UTC+0)	5/31/2023 8:45:44 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	5/31/2023 8:07:38 PM(UTC+0)	5/31/2023 8:07:44 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	5/31/2023 8:07:38 PM(UTC+0)	5/31/2023 8:09:34 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	5/31/2023 8:07:38 PM(UTC+0)	5/31/2023 8:08:33 PM(UTC+0)	
14243026161@s.whatsapp.net Fbi International	5/31/2023 8:07:39 PM(UTC+0)	5/31/2023 8:07:45 PM(UTC+0)	
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	5/31/2023 8:07:38 PM(UTC+0)	5/31/2023 8:10:37 PM(UTC+0)	

Status: Read Platform: Mobile

5/31/2023 8:07:36 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29FE80D (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

iPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl
ist : 0x2C1D (Size: 39391 bytes)
iiPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite : 0x54464 (Table:
ZWABIZVERIFIEDNAME; Size: 405504 bytes)
iiPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite : 0x9A8A5 (Table:
ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

ok sir, i'll look Status: Read Platform: Mobile

5/31/2023 8:09:30 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x29FE52B (Table: ZWAMESSAGE; Size: 84033536 bytes)

iPhone infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

Exhibit S

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 43 of 105

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Yes sir Status: Read Platform: Mobile

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x296D8BE (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

Take all the guys to Zara in Santafé mall get one of the managers to help you tell them it's for Prince Khalifa's Diplomatic Police team get everyone 3 suits 5 new shirts

Platform: Mobile

5/19/2023 6:08:51 PM(UTC+0)

Source Info:

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Ok sir Status: Read Platform: Mobile

5/19/2023 6:09:22 PM(UTC+0)

Source Info:

IPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag
e.sqlite: 0x29702E3 (Table: ZWAMESSAGE; Size: 84033536 bytes)
iPhone
(700)/e.skliz/Containers/Chand/AppGroup/group.appdroup/gr

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

My lord, we are in Zara, but they are very short of stock and sizes, I don't know if we could better go to the Arturo Calle store to see if there are more options, do you authorize us?

Status: Read Platform: Mobile

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x297126E (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

GOVERNMENT **EXHIBIT** S

Exhibit T

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 45 of 105

573054043996@s.whats 5/23/2023 app.net Mauricio Pine/ 5:44:20 Medellin Security PM(UTC+0) PM(UTC +0) 573173698994@s.whats 5/23/2023 app net Nelson 5:44:18 app.net Nelson Vasqus/Medelin Security 5:44:23 PM(UTC +0) 573003105943@s.whats 5/23/2023 app.net Veronica Gaviria New Security Medellin PM(UTC+0) 3 5:44:25 PM(UTC +0) 14243026161@s.whatsa 5/23/2023 pp.net Fbi International 5:44:20 PM(UTC+0) 6:33:40 PM(UTC 573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security 5:45:14 PM(UTC +0) PM(UTC+0)

Status: Read Platform: Mobile

5/23/2023 5:44:17 PM(UTC+0)

Source Info: iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29A1238 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Mi señor ya iniciaron los trabajos en ambos carros, a la range le están instalando las luces federales y al mercedez le están quitando los polarizados, luego limpiaran con máquina los vidrios para dejarlo completamente limpios antes de instalar los nuevos polarizados y lo entregaran a las 4:30 para llevarlo al lavadero a encerar y brillar la pintura

Status: Read Platform: Mobile

5/23/2023 5:48:03 PM(UTC+0)

Source Info

Source Info: (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29A29D1 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

My lord, work has already started on both cars, the federal lights are being installed on the range and the tinted ones are being removed from Mercedes, then they will clean the windows with a machine to leave it completely clean before installing the new tinted ones and they will deliver it at 4 o'clock: 30 to take it to the laundry room to wax and shine the paint

Platform: Mobile

5/23/2023 5:48:38 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29A25D4 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table:

ZWAADDRÉSSBOOKCONTACT; Size: 1110016 bytes)



Exhibit U

Name: Medellin Diplomatic, Security Team Part 2 Start Time: 4/21/2023 4:56:56 PM(UTC+0) Last Activity: 6/20/2023 10:14:34 PM(UTC+0)

Number of attachments: 348

Source: WhatsApp Account: 16504073547@s.whatsapp.net

Account: 19504073547(@s.whatsapp.net
Source file: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x8C9B8
(Table: ZWACHATSESSION, ZWAMESSAGE; Size: 84033536 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.sh (252)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Media/Profile/120363146137425770-1682096789.jpg: 0x0 (Size: 21053 bytes) Body file: chat-2.txt

Participants:

573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director



573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D



14243026161@s.whatsapp.net

Fbi International



16504073547@s.whatsapp.net Prince Fred K. (owner) (admin)



573195878661@s.whatsapp.net

Fabián Galeano/ Medellin Asst Security Director



573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin



573134898040@s.whatsapp.net

Julio Salazar

Identifier: 120363146137425770@g.us

From: System Message System Message

Prince Fred K. (16504073547@s.whatsapp.net owner) created the group "Medellin Diplomatic, Security Team Part 2"

Platform: Mobile Label: System

4/21/2023 4:56:56 PM(UTC+0)

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x283FF7E (Table: ZWAMESSAGE; Size: 84033536 bytes)

GOVERNMENT EXHIBIT U

Exhibit V

From: 16504073547@s. whatsapp.net Prince Fred K. (owner)
To: 573195878661@s. whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573054043996@s. whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573003105943@s. whatsapp.net Veronica Gaviria New Security Medellin
To: 573173698994@s. whatsapp.net Nelson Vasqus/Medelin Security D
To: 573134898040@s. whatsapp.net Julio Salazar

Read all headlines & learn whom they are internationally not just USA

https://www.google.com/search?q=diplomatic+security+service+international&client=safari&bih=526&biw=314&hl=en-US&ei=K8hCZNvNKcCykvQP6LOT6AE&oq=diplomatic+security+service+internat&gs_lcp=ChNtb2JpbGUtZ3dzLXdpei1zZXJwEAEYADIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQoAEQCjIHCCEQOAEQCjIHCCEQOAEGBAghAEUGCAgAEIAEEMkDOgYIABAWEB46BQgAEIAESgQIQRgAUN4PWKFWYMBfaAFwAHgAgAHvAYgByAySAQYwLjExLjGYAQCgAQHIAQjAAQE&sclient=mobile-gws-wiz-serp

Attachments:



Title: diplomatic security service international - Google Search Size: 2847

ww.google.com/knowledgegraphshares?q=diplomatic+security+service+international&client=safari&bih=526&biw=314&hl=en-K8hCZNvNKcCykvQP6LOT6AE&oq=diplomatic+security+service+internat&gs_lcp=ChNtb2JpbGUtZ3dzLXdpei1zZXJwEAEYADI oAEQCjiHCCEQoAEQCiHCCEQoAEQCjilCCEQFhAeEB06CggAEEcQ1gQQsAM6AggpOggIABCKBRCGAzoFCCEQoAE6BA CAQAEIAEEMkDQgYIABAWEB46BQgAEIAESgQIQRgAUN4PWKFWYMBfaAFwAHgAgAHvAYgByAySAQYwLjExLjGYAQCgA AAQE&sclient=mobile-gws-wiz-serp

Participant	Delivered	Read	Played
573195878661@s.whatsapp.net Fabian Galeano/ Medellin Asst Security Director	4/21/2023 5:31:43 PM(UTC+0)	4/21/2023 5:32:19 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:31:42 PM(UTC+0)	4/21/2023 5:31:56 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:31:47 PM(UTC+0)	4/21/2023 5:31:55 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:31:42 PM(UTC+0)	4/21/2023 5:31:48 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:31:44 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

4/21/2023 5:31:42 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2840894 (Table: ZWAMESSAGE, ZWAMESSAGEDATAITEM, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl ist: 0x2C1D (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/4/f/4fb9d40b-8739-4cfb-8bd0-1ba5106cbbba.thumb: (Size: 2847 bytes)

GOVERNMENT **EXHIBIT** ٧

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 50 of 105

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573134898040@s.whatsapp.net Julio Salazar

FYI Read

https://en.wikipedia.org/wiki/Diplomatic_Security_Service



Participant	Delivered	Read	Played
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:32:39 PM(UTC+0)	4/21/2023 5:32:52 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:32:39 PM(UTC+0)	4/21/2023 5:32:51 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:32:39 PM(UTC+0)	4/21/2023 5:32:59 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:32:39 PM(UTC+0)	4/21/2023 5:36:23 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:32:57 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x28407AF (Table: ZWAMESAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770 @g.us/d/f/dfa70ab5-b58e-4952-9af0-ba1d7f44198a.thumb: (Size: 8132 bytes)

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 51 of 105

From: 16504073547@s. whatsapp.net Prince Fred K. (owner)
To: 573195878661@s. whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573054043996@s. whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573003105943@s. whatsapp.net Veronica Gaviria New Security Medellin
To: 573173698994@s. whatsapp.net Nelson Vasqus/Medelin Security D
To: 573134898040@s. whatsapp.net Julio Salazar

hltps://www.google.com/search?q=diplomatic+security+service+international&client=safari&hl=en-US&prmd=nisv&source=lnms&tbm=nws&sa=X&ved=2ahUKEwiFzluewLv-AhVsTTABHU_4B2MQ_AUoAXoECAlQAQ&biw=314&bih=525&dpr=3

Attachments:



Title: diplomatic security service international - Google Search Size: 2847
Path: https://www.google.com/knowledgegraphshares?q=diplor Patri: https://www.google.com/knowledgegraphshares?q=diplomatic+security+service+interna US&prmd=nisv&source=Inms&tbm=nws&sa=X&ved=2ahUKEwiFzluewLv-AhVsTTABHU_4B2MQ_AUoAXoECAlQAQ&biw=314&bih=525&dpr=3 URL

Participant	Delivered	Read	Played
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:33:28 PM(UTC+0)	4/21/2023 5:34:39 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:33:28 PM(UTC+0)	4/21/2023 5:33:49 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:33:27 PM(UTC+0)	4/21/2023 5:33:30 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:33:27 PM(UTC+0)	4/21/2023 5:36:23 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:33:37 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

4/21/2023 5:33:26 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x284056A (Table: ZWAMESSAGE, ZWAMESSAGEDATAITEM, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZ/ERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/Shared/AppGroup/Shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZ/ERIFIEDNAME; Size: 405504 bytes)

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/7/a/7a1ab410-371e-428e-9d40-fd2d43051e1e.thumb: (Size: 2847 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst
Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573134898040@s.whatsapp.net Julio Salazar

Pro-and-Con-Handbook-Update-on-Dec-2018

Attachments:

Director

Title: Study this is important
Size: 1151856
File name: 9f540e8c-4e86-492b-8445-188afafd755a.pdf
Path: https://mmg.whatsapp.net/v/f62.711924/40928910 3467256070211637 9106640164625016683_n.enc?ccb=114&oh=01 AdR4GjYffGTrCkQoon,U78yqkkPLRsbQ0BxN_3wJA9 Hkw&oe=646A5296&mms3=true
9f540e8c-4e86-492b-8445-188afafd755a.pdf

Participant	Delivered	Read Played	
	5:36:20	4/21/202 3	
Medellin Asst Security	PM(LITC+0)	5.36.34	

PM(UTC

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 52 of 105

		+0)
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:36:20 PM(UTC+0)	4/21/202 3 5:36:24 PM(UTC +0)
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	4/21/2023 5:36:21 PM(UTC+0)	4/21/202 3 5:36:32 PM(UTC +0)
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	4/21/2023 5:36:23 PM(UTC+0)	4/21/202 3 5:36:23 PM(UTC +0)
573134898040@s.whats app.net Julio Salazar	4/21/2023 5:36:21 PM(UTC+0)	4/21/202 3 5:45:19 PM(UTC +0)

Status: Read Platform: Mobile

4/21/2023 5:36:18 PM(UTC+0)

Source Info: iPhone

iPnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x28406DD (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.WhatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Containers/Chatsapp.whatsApp.shared/Chatsapp.w

ır-none (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite : 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone

ırnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) (732)/mobile/Containers/Shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

IP-none (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/9/f/9f540e8c-4e86-492b-8445-188afafd755a.pdf: (Size: 1151856 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst
Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security
Medellin
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573134898040@s.whatsapp.net Julio Salazar

Diplomaticka_prirucka__aktualizace__EN

Attachments:

Title: Mauricio and Nelson make sure you translate this in your team reason understands it Size: 14200569
File name: 6a 1ae471-54f9-4af1-838e-a5b3b5ed1e26.pdf
Path: https://mmg.whatsapp.netv/t62.711924/30694309-248822710932475 1336986897143914239_n.enc?ccb=11-48ch=01_AdSLGNDknR7sXNIEB_KH51mOqdjitUR18EzPp_8VAMGgXg&oe=646A3D
0C&mms3=true

6a1ae471-54f9-4af1-838e-a5b3b5ed1e26.pdf

Participant	Delivered	Read	Played
573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:38:02 PM(UTC+0)	4/21/202 3 5:38:07 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:38:02 PM(UTC+0)	4/21/202 3 5:38:02 PM(UTC +0)	
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	4/21/2023 5:38:02 PM(UTC+0)	4/21/202 3 5:39:09 PM(UTC +0)	
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	4/21/2023 5:38:02 PM(UTC+0)	4/21/202 3 5:38:15 PM(UTC +0)	
573134898040@s.whats	4/21/2023	4/21/202	

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 53 of 105

Status: Read Platform: Mobile

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x2840497 (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone

iPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Pref
erences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes)
iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/6/a/6a1ae471-54f9-4af1-838e-a5b3b5ed1e26.pdf: (Size: 142005680 bytes) 14200569 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner) To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573134898040@s.whatsapp.net Julio Salazar

Attachments:

Title: And this one is from UN Size: 9972782 File name: 58553155-3715-4967-a043-bbe3842c3ba1.pdf Path: https://mmg.whatsapp.net/v/f62.7119-24/40132593_1369688533875185_3205389638693731618_n.enc?ccb=11-4&oh=01_AdQsbCpY1wdurNhIm43U23e4sW3rTPhIzQYbcg_jixzNYQ&oe=646A29D5

58553155-3715-4967-a043-bbe3842c3ba1.pdf

Participant	Delivered	Read	Played
573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:41:08 PM(UTC+0)	4/21/202 3 5:41:12 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:41:08 PM(UTC+0)	4/21/202 3 5:42:29 PM(UTC +0)	
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	4/21/2023 5:41:09 PM(UTC+0)	4/21/202 3 5:41:14 PM(UTC +0)	
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	5:41:08	4/21/202 3 5:44:35 PM(UTC +0)	
573134898040@s.whats app.net Julio Salazar	4/21/2023 5:42:13 PM(UTC+0)	4/21/202 3 5:45:19 PM(UTC +0)	

Status: Read Platform: Mobile

4/21/2023 5:41:05 PM(UTC+0)

Source Info:

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x284009B (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.WhatsApp.shared/AppGroup/group.net.whatsapp.whatsapp.whatsapp.whatsapp.whatsapp.whatsapp.whatsapp.whatsapp.whatsapp.group.group.group.group.group.group.group.group.group.group.gro

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone

E 0X54464 (Table: ZWABIZVERIFIEDNAME, SIZE, 700007 E., E., iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/5/8/58553155-3715-4967-a043-bbe3842c3ba1.pdf: (Size: 9972782 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 573134898040@s.whatsapp.net Julio Salazar

Task-Based Simulations for Diplomatic Security Agents (10C) - The Cambridge Handbook of Task-Based Language Teaching

United States Department of State Foreign Service officers are usually required to learn a United States Department of State Foreign Service officers are usually required to learn a language spoken in the country of their onward diplomatic position. Their primary objective is functional ability to do their jobs using the target language. The Foreign Service Institute (FSI) trains (a) diplomats (e.g., consular affairs, public diplomacy, management, and political or economic officers) and (b) specialists (e.g., diplomatic security, information technology, financial management, and general services) in more than sixty languages. We derived this case study from FSI's Spanish tradecraft curriculum developed with and for specialist officers, who are Diplomatic Security (DS) agents. About half of all FSI Spanish students are returning students, already experienced at their jobs, needing to learn Spanish for their next onward post. The other half typically are entry-level officers and first-time language learners, who preferably attend FSI's introductory tradecraft training in English before enrolling in Spanish.

Participant	Delivered	Read	Played
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:42:21 PM(UTC+0)	4/21/2023 5:44:35 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:42:21 PM(UTC+0)	4/21/2023 5:42:29 PM(UTC+0)	
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:42:22 PM(UTC+0)	4/21/2023 5:42:22 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:42:21 PM(UTC+0)	4/21/2023 5:42:41 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:42:32 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2841A64 (Table: ZWAMESSAGE; Size: 84033536 bytes)

ZWAMESSAGE; Size: 84033330 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl ist: 0x2C10 (Size: 33931 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x68EC1 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medellin Security D
To: 573134898040@s.whatsapp.net Julio Salazar

https://www.cambridge.org/core/books/cambridge-handbook-of-taskbased-language-teaching/taskbased-simulations-for-diplomatic-security-agents/CDF7DB8BD0C5F46005F481697D649141

Attachments:



Title: Task-Based Simulations for Diplomatic Security Agents (10C) - The Cambridge Handbook of Task-Based Language Teaching Size: 6479
File name: The Cambridge Handbook of Task-Based Language Teaching - December 2021
Patth: https://www.cambridge.org/core/books/cambridge-handbook-of-taskbased-language-teaching/taskbased-simulations-for-diplomatic-security-agents/CDF7D88BD0C5F46005F481697D649141

The Cambridge Handbook of Task-Based Language Teaching - December 2021

Participant	Delivered	Read	Played
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:42:46 PM(UTC+0)	4/21/2023 5:44:10 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:42:45 PM(UTC+0)	4/21/2023 5:45:03 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:42:46 PM(UTC+0)	4/21/2023 5:42:46 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:42:46 PM(UTC+0)	4/21/2023 5:44:35 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:42:45 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

4/21/2023 5:42:43 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2841736 (Table: ZWAMESSAGE, ZWAMESSAGEDATAITEM, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone iPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl ist: 0x2C1D (Size: 33931 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/Group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

in-none (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/b/4/b4b60587-3193-4d95-b0b3-0f2174b2cad5.thumb: (Size: 6479 bytes)

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 56 of 105

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573134898040@s.whatsapp.net Julio Salazar

Last but not least:

https://www.un.org/dgacm/en/content/protocol/manual-of-protocol

Participant	Delivered	Read	Played
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:44:10 PM(UTC+0)	4/21/2023 5:44:10 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:43:32 PM(UTC+0)	4/21/2023 5:45:03 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	4/21/2023 5:43:32 PM(UTC+0)	4/21/2023 5:44:11 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	4/21/2023 5:43:32 PM(UTC+0)	4/21/2023 5:44:35 PM(UTC+0)	
573134898040@s.whatsapp.net Julio Salazar	4/21/2023 5:43:41 PM(UTC+0)	4/21/2023 5:45:19 PM(UTC+0)	

Status: Read Platform: Mobile

4/21/2023 5:43:31 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite : 0x2841974 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

iPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/plist: 0x2C1D (Size: 39391 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0xA69C2 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573195878661@s.whatsapp.net Fabian Galeano/ Medellin Asst
Security Director
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

Director
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

176589

Attachments:

Title: Final information before you alls interview Mauricio, Nelson on the team!!!!
Size: 18416845
File name: 54fcfc0b-62ce-40e3-99f2-7a532568a2e5.pdf
Path: https://mmg.whatsapp.net/v/f62.711924/26619984 220802393980329 5030408143932656003_n.enc?ccb=114&ch=01_AdTLgFIruK15q0FNrs59ePLmWL4E7ylMejRkR6C9tyQnA&oe=646A37F8&mms3=true
54fcfc0b-62ce-40e3-99f2-7a532568a2e5.pdf

Participant	Delivered	Read	Played
573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security Director	4/21/2023 5:45:15 PM(UTC+0)	4/21/202 3 5:45:22 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	4/21/2023 5:45:15 PM(UTC+0)	4/21/202 3 5:46:48 PM(UTC +0)	
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	4/21/2023 5:45:16 PM(UTC+0)	4/21/202 3 5:49:33 PM(UTC +0)	
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	4/21/2023 5:45:15 PM(UTC+0)	4/21/202 3 5:50:05 PM(UTC +0)	

Exhibit W

From: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D

Johana's was ready and she went to pick it up.

Status: Read Platform: Mobile

5/18/2023 8:42:03 PM(UTC+0)

Source Info: iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2959D22 (Table: ZWAMESSAGE; Size: 84033536 bytes)

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x68EC1 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

Nelson you are fired Your services no longer need it Turn your gun to Mauricio and have a nice day

Status: Read Platform: Mobile

5/18/2023 8:42:55 PM(UTC+0)

Source Info: iPhone (232 Fibnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2959BB5 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

Your service is no longer needed

Status: Read Platform: Mobile

5/18/2023 8:43:05 PM(UTC+0)

Source Info:

ir none (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2959798 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

Nelson, I have asked you many times do not communicate with Andrea's family only communicate with me you can't teach an old dog new tricks. I'm not gonna argue with you I'm not gonna disrespect you I'm just going to discontinue my relationship with you I'm tired of it your way to ignore him for me.

Status: Read Platform: Mobile

5/18/2023 8:46:44 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29590CD (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)



Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 59 of 105

From: 14243026161@s.whatsapp.net Fbi International

I enjoyed it over \$10,000 saving you have able to capture through me and move on with your life one lesson stop being so ignorant stop being so selfish and self-centered when you have a commander-in-chief listen to your commander do as he says not as you wish today is going to teach you a great lesson just sick as teaching Fernando

Status: Read Platform: Mobile

5/18/2023 8:47:46 PM(UTC+0)

Source Info:

Fibnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x295A488 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 16504073547@s. whatsapp.net Prince Fred K. (owner)
To: 573134898040@s. whatsapp.net Julio Salazar
To: 573054043996@s. whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573173698994@s. whatsapp.net Nelson Vasqus/Medelin Security D
To: 573003105943@s. whatsapp.net Veronica Gaviria New Security Medellin
To: 14243026161@s. whatsapp.net Fbi International
To: 573195878661@s. whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Since you guys are begging her family to save your job, which you're fucking pathetic, you should be man enough to not make these type of mistakes for your age for your occupation for god sake, you're a bodyguard of a fucking billionaire, you getting government cadential's because of him this is how it's going to go down you're both going to send me a message right now confessing and telling me the truth from A-to-Z why Nelson ignored taking Johanna's car to the Will shop. If you don't come clean with me you can go fuck yourself. If you come clean with me we will make a decision if you have a second chance with me or not I'm very fucking serious not to mention I have the entire diplomatic officers and the CIA team in town as of hour ago.

Participant	Delivered	Read	Played
573134898040@s.whatsapp.net Julio Salazar	5/18/2023 9:33:59 PM(UTC+0)	5/18/2023 9:33:59 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	5/18/2023 9:33:59 PM(UTC+0)	5/18/2023 9:33:59 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	5/18/2023 9:33:59 PM(UTC+0)	5/18/2023 9:34:04 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	5/18/2023 9:33:58 PM(UTC+0)	5/18/2023 9:33:58 PM(UTC+0)	
14243026161@s.whatsapp.net Fbi International	5/18/2023 9:34:00 PM(UTC+0)	5/18/2023 9:54:30 PM(UTC+0)	
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	5/18/2023 9:34:00 PM(UTC+0)	5/18/2023 9:34:06 PM(UTC+0)	

Status: Read Platform: Mobile

5/18/2023 9:33:58 PM(UTC+0)

Source Info:

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x2960506 (Table: ZWAMESSAGE; Size: 84033536 bytes)

ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl ist: 0x2C10 (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

Exhibit X

WV-109 Notice of Court Hearing	Clerk stamps date here when form is filed.
a. Name: Monster Products, et al. Lawyer for Petitioner (if any for this case): Name: John Valencia Firm Name: TDA Associates b. Address (If you have a lawyer, give your lawyer's information.): Address: 869 North Douglas Street City: El Segundo Telephone: (310) 615-9990 Fax: (310) 615-9991 E-Mail Address: johnwvalencia@gmail.com 2 Employee in Need of Protection Full Name: Noel Lee, et al.	SAN MATEO COUNTY JUL 2 7 2018 Clerk of the Superior Court By DEPUTY CLERK Fill in court name and street address: Superior Court of California, County of San Mateo 400 County Center Redwood City, CA 94063 Fill in case number: Case Namber: V 0 3 9 1 6
Respondent (Person From Whom Protection Is Sought) Full Name: Fereidoun "Fred" Khalilian	18-64 4 0 9 3 1 3
Hearing Date: Por Room:	ders against the respondent:
5 Temporary Restraining Orders (Any orders granted are on Form	WV-110, served with this notice.)
 a. Temporary Restraining Orders for personal conduct and stay away o Request for Workplace Violence Restraining Orders, are (check only (1) All GRANTED until the court hearing. 	rders as requested in Form WV-100, one box below):
Request for Workplace Violence Restraining Orders, are (check only	rders as requested in Form WV-100, one box below):

GOVERNMENT EXHIBIT

X

Revised Ja	anuary	1, 2012		Notice of Court Hearing (Workplace Violence Prevention)	WV-109	, Page 2 of 3
,	•]	If you Form	are WV	unable to serve the respondent in time, you may ask for mon- -115, Request to Continue Court Hearing and to Reissue Te	re time to serve the documents. Imporary Restraining Order.	Use
				nation about service, read Form WV-200-INFO, What Is "P		
	,	the pe	erson	cannot make the restraining orders after the court hearing u wed) a copy of your request and any temporary orders. To sl who served the forms must fill out a proof of service form. ay be used.	Your that the reamond 1	
				To the Petitioner:		
		Date:	_	Judicial Officer	702	
		-		(specify):		
	e.	WV-	250,	INFO, How Can I Respond to a Petition for Workplace Vio Proof of Service of Response by Mail (blank form)	lence Restraining Orders?.	
	c.	WV-	120,	Response to Petition for Workplace Violence Restraining C	Orders (blank form)	
	ь.	A.	WV-	110, Temporary Restraining Order (file-stamped) IF GRA	NTED	
	a	WV-	100,	Petition for Workplace Violence Restraining Orders (file-s	tamped)	
			-	must personally give (serve) a court file-stamped copy of the dent along with a copy of all the forms indicated below:	nis Form WV-109, Notice of Co.	one to be urt Hearing,
	At	least	X	five \(\square \) days before the bearing	10 19 an ald	
6	Se	rvic	e of	Documents by the Petitioner		
		-				
		-				
		_				
		(2)		Other (specify):		u .
		(1)		The facts as stated in Form WV-100 do not sufficiently sh has suffered unlawful violence or a credible threat of viole irreparable harm to the employee would result if a temporary	noo by the	
		V 101	ence	Restruting Orders, for personal conduct or stay away are	denied are:	
	b.	Reas	sons	that Temporary Restraining Orders as requested in Form W	V-100, Petition for Workplace	
					Case Number:	

Case Number:	

To the Respondent

- If you want to respond to the request for orders in writing, file Form WV-120, Response to Request for Workplace Violence Restraining Orders, and have someone age 18 or older—not you or anyone to be protected—mail it to the petitioner.
- The person who mailed the form must fill out a proof of service form. Form WV-250, Proof of Service of
 Response by Mail, may be used. File the completed form with the court before the hearing and bring a copy with
 you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to three years and
 may order you to sell or turn in any firearms that you own or possess.



Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons with Disabilities and Response (Form MC-410). (Civ. Code, § 54.8.)

(Clerk will fill out this part.)

-Clerk's Certificate-

I certify that this Notice of Court Hearing is a true and correct copy of the original on file in the court.



JUL 2 7 2018

Date: _____

Clerk, by

, Deputy

RODINA M. CATALANO

Revised January 1, 2012

Notice of Court Hearing (Workplace Violence Prevention)

WV-109, Page 3 of 3

L N	Name: Monster Products, et al.		FILED
N			SAN MATEO COUNTY
	awyer for Petitioner (if any, for this		
· · · · · ·	Name: John Valencia	State Bar No.: 211794	JUL 27 2018
	irm Name: TDA Associates		Clerk of the Superior Court
D. Y	our Address (If you have a lawyer,	give your lawyer's information.)	By
	ddress: 869 North Douglas Street		DEPUTY CLERK
	ity: El Segundo	State: CA Zip: 90245	Fill in court name and street address: Superior Court of California, County
Te	elephone: (310) 615-9990	Fax: (310) 615-9991	San Mateo
E-	-Mail Address: johnwvalencia@gn	nail.com	- Jan Marco
Emp	oloyee (Protected Person)		400 City Center
Full N	Name: Noel Lee		Redwood City, California 94063
Res	pondent (Restrained Person	1)	Court fills in case number when form is filed.
	Name: Fereidoun "Fred" Khalilian	''	Case Number C V 0 3 9 1 6
Descr	ription:		
City:	e Address (if known): 5600 Wilshi Los Angeles tionship to Employee: Former interior	State	e: CA Zin: 0002
	dditional Protected Persons		
ln add	ition to the employee, the following rary orders indicated below:	family or household members of	or other employees are protected by the
	Full Name	Sex Age Household	Member? Relation to Employee
	y Raye Elliott	F 36	No Employee
Lucas	Gomes	M40	x No Employee
		M49	No Independent Contractor
Amir S		at the end of this Order on Attac	chment 4.
	ditional protected persons are listed		
× Add	ation Date		
× Add	ation Date	ng scheduled for the date and to	ime below:
× Add		ing scheduled for the date and to	ime below:

Case Number:
To the Respondent: the court has issued the temporary orders checked as granted below. If you do not obey these orders, you can be compared with a crime. You may have to go to jail for up to one year, pay a fine of up to \$1,000, or the contract of the c
Personal Conduct Orders
□ Not Requested □ Denied Until the Hearing ▼ Granted as Follows:
 a. You are ordered not do the following things to the employee and to the other protected persons listed in 4:
 Harass, molest, strike, assault (sexually or otherwise), batter, abuse, destroy personal property of, of disturb the peace of the person.
(2) \(\overline{\text{X}}\) Commit acts of violence or make threats of violence against the person.
(3) X Follow or stalk the person during work hours or to or from the place of work. (4) X Contact the person either directly as in the class of the place of work.
(4) Contact the person, either directly or indirectly, in any way, including, but not limited to, in person telephone, in writing, by public or private mail, by e-mail, by fax, or by other electronic means.
(5) Enter the workplace of the person.
(6) X Take any action to obtain the person's address or locations. If this item is not checked, the court has found good cause not to make this order.
(7) X Other (specify):
Other personal conduct orders are attached at the end of this Order on Attachment 6a(7).
Contact any protected person's family, school, or place of employment.
b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related a court case is allowed and does not violate this order. However, you may have your papers served by ma on the petitioner.
Stay-Away Order
□ Not Requested □ Denied Until the Hearing ☑ Granted as Follows:
a. You must stay at least yards away from (check all that apply):
(1) The employee (7) The employee's children's place of child care
(2) Each other protected person listed in (4) (8) The employee's vehicle
(3) The employee's workplace (4) The employee's home GOI GATEWAY BLVO #900 (5) The employee's school SOUTH SAN FRANCISCO, CA 94080
(4) The employee's home South SAN ENANCISCO CA 94000
(5) The employee's school SOUTH SAN FRANCISCO, CA 97080
(6) The employee's children's school
b. This stay-away order does not prevent you from going to or from your home or place of employment.
This is a Court Order.
Temporary Restraining Order (CLETS—TWH) WV-110, Page

Temporary Restraining Order (CLETS—TWH (Workplace Violence Prevention)

VVV-110, Page 2 of 5

					Case Number:	
No Cu	O.					
a. You	cannot own, pos rms, or ammunit	Firearms and And seess, have, buy or to ion.	mmunition ry to buy, receive	or try to receive	e, or in any other way get	t guns, oth
b. You		-				
(Order.	r	nuot. Tins must	be done within 2	nent agency any guns or 4 hours of being served	with this
	File a receipt with have been turned Stored for the re	and or oroned.	8 hours of receiv	ring this Order the WV-800, Proceedings	nat proves that your guns of of Firearms Turned In	or firearn , Sold, or
c. 🗌 T	he court has rece	eived information th	at you own or po	ossess a firearm.		
Other (Orders					
☐ Not	Requested	□ Denied Un	til the Hearin	a □ Gran	ted as Follows (
-		_		9 _ Clair	ted as Follows (spe	cify):
-						
Addit	ional orders are	attached at the end	of this Order on .	Attachment 9.		
		_				
		I	o the Petition	ner:		
Mandat	ory Entry of	Order Into CAR	POS Through	CLETS		
This Orde	er must be entere	Order Into CAR	POS Through	n CLETS	er System (CARPOS) thr	rough the
This Orde California	er must be entere a Law Enforcem	Order Into CAR ed into the Californi ent Telecommunica	POS Through a Restraining and tions System (CI	n CLETS I Protective Orde ETS). (Check of	ne):	rough the
This Order California a. The This D. The This D.	er must be entere a Law Enforcem ne clerk will ente	Order Into CAR ed into the Californi ent Telecommunica er this Order and its	POS Through a Restraining and tions System (CI proof-of-service	or CLETS I Protective Orde LETS). (Check of form into CARE	ne):	
This Order California a. Th b. Th int c. By del	er must be entered Law Enforcem to clerk will entered to clerk will transport of CARPOS.	Order Into CAR ed into the Californi ent Telecommunica er this Order and its smit this Order and siness on the date the ne Order and its produce	a Restraining and tions System (CI proof-of-service its proof-of-service at this Order in	Protective Ord LETS). (Check of form into CARF ice form to a law	ne): 'OS	be entered
This Order California a. Th b. Th int c. My del ent	er must be entered Law Enforcem the clerk will entered to CARPOS. In the close of bushiver a copy of the circum the carbon carb	Order Into CAR ed into the Californi ent Telecommunica er this Order and its smit this Order and siness on the date the ne Order and its produce	a Restraining and tions System (CI proof-of-service its proof-of-service at this Order is mof-of-service form	Protective Ordinary (Check of form into CARF) ice form to a law made, the employen to the law enform t	OS. enforcement agency to	be entered
This Order California a. Th b. Th int c. My del ent	er must be entered Law Enforcem the clerk will entered to CARPOS. In the close of bushiver a copy of the circuit of CARPOS arme of Law Enforcement SAN	order Into CAR ed into the Californi ent Telecommunica er this Order and its smit this Order and einess on the date the ne Order and its process: Corcement Agency	a Restraining and tions System (CI proof-of-service its proof-of-service at this Order is mof-of-service for	representation of the control of the	or or the employer's law or or ment agencies listed (City, State, Zip)	be entered
This Order California a. The b. The interpretation into the c. Market By delegation in the control of the contr	er must be entered Law Enforcem the clerk will entered the clerk will transport to CARPOS. The close of busiliver a copy of the crimto CARPOS the copy of the close of Law Enforcement SAN Additional law	order Into CAR ed into the Californi ent Telecommunica er this Order and its smit this Order and siness on the date the ne Order and its process: Corcement Agency FRANCISCO enforcement agency	a Restraining and tions System (Claproof-of-service its proof-of-service at this Order is mof-of-service for the company of th	representation of the control of the	er or the employer's law procement agencies listed	be entered
This Order California a. The b. The int c. By del ent No Fee 1	er must be entered Law Enforcem the clerk will entered to CARPOS. The close of busiliver a copy of the crimto CARPOS arme of Law Enforcement SAN Additional law to Serve (Notes a Carpo C	order Into CAR and into the Californi ent Telecommunical ar this Order and its smit this Order and siness on the date the ne Order and its process: corcement Agency FRANCISCO are enforcement agency are forcement agency	a Restraining and tions System (Cl proof-of-service its proof-of-service at this Order is mof-of-service for the service for the service for the service are listed at the service are listed at the service for the service for the service for the service are listed at the service for the	i Protective Ordiners). (Check of form into CARFice form to a law made, the employen to the law enform	er or the employer's law orcement agencies listed (City, State, Zip) rder on Attachment 10.	be entered
This Order California a. The b. The int c. By del ent No Fee t The sherift	er must be entered Law Enforcem the clerk will entered the clerk will transport to CARPOS. The close of business are copy of the close of business are of Law Enforced to Serve (Note for marshal will for marshal will an entered to Serve (Note to S	order Into CAR ad into the California ent Telecommunica ar this Order and its smit this Order and siness on the date the ne Order and its process: Corcement Agency FRANCISCO are enforcement agency tify) Restrained a serve this Order with	a Restraining and tions System (Claproof-of-service its proof-of-service at this Order is mof-of-service form to for the control of the contr	n CLETS If Protective Ord LETS). (Check of form into CARF ice form to a law hade, the employ n to the law enform Address he end of this Or Cordered ause:	or or the employer's law or or ment agencies listed (City, State, Zip)	be entered
This Order California a. The b. The int c. By del ent No Fee t The sheriff	er must be entered Law Enforcem the clerk will entered the clerk will transport to CARPOS. The close of business are copy of the close of business are of Law Enforced to Serve (Note for marshal will for marshal will an entered to Serve (Note to S	order Into CAR and into the Californi ent Telecommunical ar this Order and its smit this Order and siness on the date the ne Order and its process: corcement Agency FRANCISCO are enforcement agency are forcement agency	a Restraining and tions System (Claproof-of-service its proof-of-service at this Order is mof-of-service form to for the control of the contr	n CLETS If Protective Ord LETS). (Check of form into CARF ice form to a law hade, the employ n to the law enform Address he end of this Or Cordered ause:	er or the employer's law orcement agencies listed (City, State, Zip) rder on Attachment 10.	be entered
This Order California a. The b. The int c. M. By del ent No Fee 1 The sheriff a. The	er must be entered Law Enforcem the clerk will entered to CARPOS. The close of busiliver a copy of the close of busiliver a copy of the close of Law Enforcem SAN Additional law to Serve (Note of or marshal will be Order is based)	order Into CAR ad into the California ent Telecommunica ar this Order and its smit this Order and siness on the date the ne Order and its process: Corcement Agency FRANCISCO are enforcement agency tify) Restrained a serve this Order with	a Restraining and tions System (Clarket proof-of-service its proof-of-service at this Order is mof-of-service form the proof-of-service form the proof-of-service form the proof-of-service form the proof-of-service its are listed at the proof-of-service of violence or statement of violence or statement in the proof-of-service its proof-of-service form the proof-of-service its proof-of-service form the proof-of-service its proof-of-service form the proof-of-	n CLETS If Protective Ord LETS). (Check of form into CARF ice form to a law hade, the employ n to the law enform Address he end of this Or Cordered ause:	er or the employer's law orcement agencies listed (City, State, Zip) rder on Attachment 10.	be entered
This Order California a. The b. The int c. May be del ent No Fee 1 The sheriff a. The	er must be entered Law Enforcem the clerk will entered to CARPOS. The close of busiliver a copy of the close of busiliver a copy of the close of Law Enforcem SAN Additional law to Serve (Note of or marshal will be Order is based)	order Into CAR and into the Californi ent Telecommunical ar this Order and its smit this Order and siness on the date the ne Order and its prod S: Corcement Agency FRANCISCO Trenforcement agency are enforcement agency are enforcement agency are enforcement agency are into the corder with the order of the order with the order of the order with the order of the order of the order with the order of t	a Restraining and tions System (Clarket proof-of-service its proof-of-service at this Order is mof-of-service form the proof-of-service form the proof-of-service form the proof-of-service form the proof-of-service its are listed at the proof-of-service of violence or statement of violence or statement in the proof-of-service its proof-of-service form the proof-of-service its proof-of-service form the proof-of-service its proof-of-service form the proof-of-	i Protective Ordiners). (Check of form into CARFice form to a law made, the employen to the law enformation of this Ordered ause: alking.	er or the employer's law orcement agencies listed (City, State, Zip) rder on Attachment 10.	be entered

	Case Number:	
Number of pages attached to this Order, if any: Date: JUL 2 7 2018 Judicial Office)27)	>

Warnings and Notices to the Restrained Person in 2

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get guns, other firearms, or ammunition while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to or store with a licensed gun dealer or turn in to a law enforcement agency any guns or other firearms that you have or control as stated in item (8) above. The court will require you to prove that you did so.

Notice Regarding Nonappearance at Hearing and Service of Order

If you have been personally served with this Temporary Restraining Order and form WV-109, *Notice of Court Hearing*, but you do not appear at the hearing either in person or by a lawyer, and a restraining order that is the same as this Temporary Restraining Order except for the expiration date is issued at the hearing, a copy of the order will be served on you by mail at the address in item 3.

If this address is not correct or you wish to verify that the Temporary Restraining Order was converted into a restraining order at the hearing without substantive change, or to find out the duration of the order, contact the clerk of the court.

After You Have Been Served With a Restraining Order

- Obey all the orders. Any intentional violation of this Order is a misdemeanor punishable by a fine or by imprisonment in a county jail, or by both fine and imprisonment. (Pen. Code, § 273.6.)
- Read form WV-120-INFO, How Can I Respond to a Petition for Orders to Stop Workplace Violence?, to learn how to respond to this Order.
- If you want to respond, fill out form WV-120, Response to Petition for Workplace Violence Restraining Orders,
 and file it with the court clerk. You do not have to pay any fee to file your response if the petition claims that you
 threatened violence against or stalked the employee, or placed the employee in reasonable fear of violence.
- You must have form WV-120 served on the petitioner or the petitioner's attorney by mail. You cannot do this yourself. The person who does the service should complete and sign form WV-250, Proof of Service of Response by Mail. File the completed proof of service with the court clerk before the hearing date or bring it with you to the hearing.
- In addition to the response, you may file and have declarations served, signed by you and other persons who have
 personal knowledge of the facts. You may use form MC-030, Declaration, for this purpose. It is available from the
 clerk's office at the court shown on page 1 of this form or at www.courts.ca.gov/forms. If you do not know how to
 prepare a declaration, you should see a lawyer.
- Whether or not you file a response, you should attend the hearing. If you have any witnesses, they must also go to the hearing.
- At the hearing, the judge can make restraining orders against you that last for up to three years. Tell the judge why you disagree with the orders requested.

This is a Court Order.

Temporary Restraining Order (CLETS—TWH)
(Workplace Violence Prevention)

Revised January 1, 2017

WV-110, Page 4 of 5

 \rightarrow

Case Number:	

Instructions for Law Enforcement

Enforcing the Restraining Order

This order is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Restraining and Protective Orders System (CARPOS). Agencies are encouraged to enter violation messages into CARPOS. If the law enforcement agency has not received proof of service on the restrained person, the agency must advise the restrained person of the terms of the order and then must enforce it. Violations of this order are subject to criminal penalties.

Start Date and End Date of Orders

This order starts on the date next to the judge's signature on page 4. The order ends on the expiration date in item 5 on page 1.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, this order remains in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The order can be changed only by another court order. (Pen. Code, § 13710(b).)

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued, the orders must be enforced according to the following priorities: (See Pen. Code, § 136.2, Fam. Code, §§ 6383(h)(2), 6405(b).)

- EPO: If one of the orders is an Emergency Protective Order (form EPO-001) and is more restrictive than other restraining or protective orders, it has precedence in enforcement over all other orders.
- 2. No Contact Order: If there is no EPO, a no-contact order that is included in a restraining or protective order has precedence over any other restraining or protective order.
- 3. Criminal Order: If none of the orders includes a no contact order, a domestic violence protective order issued in a criminal case takes precedence in enforcement over any conflicting civil court order. Any nonconflicting terms of the civil restraining order remain in effect and enforceable.
- 4. Family, Juvenile, or Civil Order: If more than one family, juvenile, or other civil restraining or protective order has been issued, the one that was issued last must be enforced.



(Clerk will fill out this part.)

-Clerk's Certificate-

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: JUL 2 7 2018

Clerk, by

RODINA M. CATALANO

This is a Court Order.

Temporary Restraining Order (CLETS—TWH)

(Workplace Violence Prevention)

WV-110, Page 5 of 5

privacy, please press the Clear This Form button after y

Print this form

Save this form

Clear this form

SHORT TITLE: ATTACHM CONFIDENTIAL CLET				CASE NUMBER:		
NAME	Date of Birth	Sex	Race	Relation to Person	on in 1	
Corey Dee Llewellyn	/77	M	Blk	Independent Co	ntractor	
Dave Augusto	1977	M	White	Independent Co	ntractor	
Kevin Lee	/68	M	Chinese	Employee		
(Required for verified pleadir numbers):	ng) The items on this page	stated on info	ormation and belief	are (specify item num	bers, not lin	е
This page may be used with	any Judicial Council form	or any other	paper filed with the	e court.		
Form Approved by the Judicial Council of California 4C-020 [New January 1, 1987]		DITIONAL PA	AGE		Page	RC 201, 5

WV-100

Petition for Workplace Violence **Restraining Orders**

Read How Do I Get an Order to Prohibit Workplace Violence (form C In

VV-100-INFO) before completing this form. NOTE we an employer with standing to bring this action civil Procedure section 527.8. Also fill out Confident formation (form CLETS-001) with as much inform	under Code of ntial CLETS	SA	N MATE	2 7 2	NUC	ITY	
1) Petitioner (Employer)	anon as you know.	Clei	k of the				
a. Name: Monster Products, et al.		By_			一	urt.	
is a corporation sole proprie	etorship			YCLERK			
x (specify): Please see Attachment la.		Superior (untu	-6
and is filing this suit on behalf of the employ	yee identified in item 2.	San Mate		2	1, 00	unty	OI
b. Lawyer for Petitioner (if any for this case) Name: John Valencia Firm Name: TDA Associates	State Bar No.: 211794		nty Center I City, CA		\$		
Petitioner's Address (If the petitioner has a law,	non ains the least	Court fills in					
information.)	ver, give the lawyer s	Case Num	18 C I	V 0	3	9 1	6
c. Address: 869 North Douglas Street							
Telephone: (310) 615-9990 Fax: E-Mail Address: johnwvalencia@gmail.co Employee in Need of Protection	e: <u>CA</u> Zip: <u>90245</u> (310) 615-9991						
Full Name: Noel Lee							
Sex: ▼ M ☐ F Age: <u>69</u>							
Respondent (Person From Whom Pro	tection Is Sought)						
Full Name: Fereidoun "Fred" Khalilian		Age:	47				
Address (if known): 5600 Wilshire Blvd., Apt.	#624						
City: Los Angeles	State: C	A Zip:	90036				
Additional Protected Persons							
 a. Are you asking for protection for any family employees at the employee's workplace or at X Yes \(\subseteq \) No \((If yes, list them): \) 	or household members of to tother workplaces of the pe	the employe etitioner?	e or for a	ny othe	r		
Full Name	Sex Age Househo	ld Member	? Relatio	nship to) Em	ploy	ee
Ashley Raye Elliott	F36 🗆 Yes						
Lucas Gomes		x No	Employe				
Amir Shafi		x No	Independ	ient Co	ntrac	tor	
Additional protected persons are listed in Att	not a Court Order.						

Judicial Council of California, www.courts.ca.gov Petition for Workplace Violence Restraining Orders Revised January 1, 2018, Mandatory Form Code of Civil Procedure, §§ 527.8 and 527.9 (Workplace Violence Prevention) (Workplace Violence Prevention)

WV-100, Page 1 of 6

Clerk stamps date here when form is filed.

		Case Number:
) b	Why do these people need protection? (Explain): Response is stated in Attachment 4b. Please see Attachment 4b.	
) R	How does the employee know the respondent? (Describe):	Response is stated in Attachment 5a.
b.	Respondent x is x is not a current employee of petitions or otherwise discipline the respondent):	er. (Explain any decision to retain, terminal Response is stated in Attachment 5b.
w a. b. c.	hy are you filing in this county? (Check all that apply): The respondent lives in this county. The respondent has caused physical or emotional injury to the Other (specify):	e petitioner's employee in this county.
	Has the employee or any of the persons named in 4 been involved a No Yes If yes, check each kind of case and indicate with Kind of Case Filed in (County 1) Workplace Violence (1) Workplace Violence (2) Civil Harassment	there and when each was filed:
	(3)	
	(8)	
b.	Are any restraining orders or criminal protective orders now in eff persons in (4) and the respondent? No Yes (If yes)	fect relating to the employee or any of the attach a copy if you have one.)

USAO_001919

	Case Num	ber:	
	Description of Respondent's Conduct a. Respondent has (check one or more):		
a.	 (1) Assaulted, battered, or stalked the employee (2) Made a credible threat of violence against the employee by making known engaging in a course of conduct that would place a reasonable person in fasafety of his or her immediate family. 	ing or willful statements o ear for his or her safety or	
b.	o. One or more of these acts (check either or both): (1)	Took place at the employee's workplace Can reasonably be construed to be carried out in the future at the employee's workplace	
c.	 Describe what happened. (Provide details; include the dates of all incidents beginning who did what to whom; identify any witnesses): Response is stated in Attachment 8c. 	ing with the most recent; t	
	Please see Attachment 8c.		
d.	. Was the employee harmed or injured? ☐ Yes ☒ No (If yes, describe harm ☒ Response is stated in Attachment 8d.	n or injuries):	
	Tease see Attachment od.		
e.	. Did the respondent use or threaten to use a gun or any other weapon? ☐ Yes ☐ Response is stated in Attachment 8e.	× No (If yes, describe).	
	This is not a Court Order.		

USAO_001920

For any of the incidents described above, did the police come? If yes, did the employee or the respondent receive an Emergency Pro Yes No I don't know If yes, the order protects (check all that apply): the employee the respondent one or more (Attach a copy of the order if you have one.)	
Check the orders you want Personal Conduct Orders ask the court to order the respondent not to do any of the following this e protected listed in 4: Harass, intimidate, molest, attack, strike, stalk, threaten, assault (personal property of, or disturb the peace of the person. Commit acts of unlawful violence on or make threats of violence Follow or stalk the person during work hours or to or from the pl Contact the person, either directly or indirectly, by any means, in telephone, in writing, by public or private mail, by interoffice may other electronic means. Enter the person's workplace. Other (specify): As stated in Attachment 9f. Contact any protected person's family, school, or place of employed.	sexually or otherwise), hit, abuse, destroy to the person. ace of work. acluding, but not limited to, in person, by ail, by e-mail, by text message, by fax, or b
	yards away from (check all that apply):
(1) X The employee. (8) X The employee (2) X The other persons listed in 4. (9) Other (sp. (3) X The employee's workplace. The employee's home. (5) X The employee's school. (6) X The school of the employee's children. (7) X The place of child care of the employee's children. This is not a Court Order.	ecify): loyee's spouse's school or place of nent.
	If yes, did the employee or the respondent receive an Emergency Pro Yes No I don't know If yes, the order protects (check all that apply): the employee

USAO_001921

10	 b. If the court orders the respondent to stay away from all the places listed above, will he or she st to his or her home, school, or job? X Yes No (If no, explain): Response is stated on Attachment 10b. 	ill be able to get
<u>11</u>)	1) Guns or Other Firearms and Ammunition	
	Does the respondent own or possess any guns or other firearms? Yes No I don't know	v
	If the judge grants a protective order, the respondent will be prohibited from owning, possessing, preceiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the profine effect. The respondent will also be ordered to turn in to law enforcement, or sell to or store with dealer, any guns or firearms within his or her immediate possession or control.	tective order is
12)	2 Imporary Restraining Order	
	I request that a Temporary Restraining Order (TRO) be issued against the Respondent to last until presenting form WV-110, Temporary Restraining Order, for the court's signature together with the	the hearing. I am is Petition.
	Has the Respondent been told that you were going to go to court to seek a TRO against him/her? Yes No (If you answered no, explain why below):	
	🗷 Reasons are stated in Attachment 12.	
	Please see Attachment 12.	
13)	3) ☐ Request for Less Than Five Days' Notice of Hearing	
	You must have your papers personally served on the respondent at least five days before the hearing court orders a shorter time for service. (Form WV-200-INFO explains what is proof of personal set WV-200, Proof of Personal Service, may be used to show the court that the papers have been serve	rvice. Form
	If you want there to be fewer than five days between service and the hearing, explain why:	
	Reasons are stated in Attachment 13.	
14)	4) × No Fee for Filing	
14)	No Fee for Filing I ask that there be no filing fee because the respondent has threatened violence against the employe the employee, or acted or spoken in a manner that has placed the employee in reasonable fear of v	

	Case Number:
15 No Fee to Serve Orders I ask the court to order the sheriff or marshal to serve the respondent for orders is based on a credible threat of violence or stalking.	t with the others for free because this request
Tourt Costs I ask the court to order the respondent to pay my court costs.	
I ask the court to make the following additional orders (specify):	
Additional orders requested are stated in Attachment 17.	
Respondent to pay reasonable attorney fees.	
Number of pages attached to this form, if any: Date: 7/26/2018	1.1
John Valencia Lawyer's name (if any) Lawyer	's signature
I declare under penalty of perjury under the laws of the State of Califall attachments is true and correct.	
Date: 7/26/2018 Noel Lee	
Name of petitioner Signat	ure
Chief Executive Officer Title	
	V
This is not a Court Orde	er.
Petition for Workplace Violence Re (Workplace Violence Prevent	estraining Orders WV-100, Page 6 of ntion)
vacy, please press the Clear This Form button after y	ve this form

Clear this form

ATTACHMENT 1a

The Petitioner in this matter is Monster Products, d/b/a Monster Inc., Monster Cable

 Products Inc., and Monster LLC.

1	ATTACHMENT 4a				11
2	NAME	Date of Birth	Sex	Race	Relation to Person in 1
3	Corey Dee Llewellyn	/77	M	Blk	Independent Contractor
4	Dave Augusto	/1977	M	White	Independent Contractor
5	Kevin Lee	/68	M	Chinese	Employee
6					
7					The state of the s
8					
9					1
10					
11					
12	The state of the s				
13					
14					
15					
. 16					
17	*				
18					
19					
20					
21	8				
22					
23					
24					
25					
26					
27					
28					

ATTACHMENT 4b

Founder and CEO Noel Lee is nearly 70 years old, handicapped, and unable to walk. See Declaration of Noel Lee ("Lee Decl.), ¶ 11. Yet he has repeatedly been the target of Mr. Khalilian's threats, harassment, and disparaging remarks from nearly the moment Mr. Lee brought him into the company and made him interim Chief Operating Officer.

For example, Mr. Khalilian at one point threatened that he could make Mr. Lee "disappear with the push of a button!" *Id.* at ¶ 8. In another incident, Mr. Lee was riding in his car with one of his favorite employees, a young lady named Eva King, when she began to cry. *Id.* at ¶ 6. Concerned, Mr. Lee asked her what was wrong, and she replied that Mr. Khalilian had threatened to "beat her up," and that Mr. Khalilian told her, "if you weren't a woman, I would cut off your legs." *Id.* Another example of Mr. Khalilian's psychological attacks on Mr. Lee is found in an email dated July 14, 2018, in which Mr. Khalilian disparages and embarrasses Mr. Lee in front of 14 other copied employees. *See id.* at Ex. A.

Mr. Lee is afraid of Mr. Khalilian, and he has suffered emotionally and personally over these attacks, particularly given that Mr. Lee has made Monster his entire life. Id. at ¶ 12.

Others have suffered even worse threats of violence. On July 13, 2018, Mr. Khalalian yelled at Monster independent contractor Corey Llewellyn over the phone that he was going to "fucking kill" him, and also "kill your family!" See Declaration of Corey Dee Llewellyn ("Llewellyn Dec."), ¶ 5. Mr. Llewellyn was so distraught and concerned about the threat that he felt compelled to send Mr. Khalilian an email three days later in which he states in part, "I take threats on my life seriously and my families very seriously. Not only is it unprofessional but it is also criminal." Id. at Ex. A.

Lucas Gomes' first day on the job as a Sales Manager was marred by a phone call he was subjected to where Mr. Khalilian spewed a stream of profanities at Mr. Lee over a speaker phone, including that he was a "fucking cock sucker." *See* Declaration of Lucas Gomes ("Gomes Decl."), ¶ 5. Things didn't get much better for Mr. Gomes when just a few weeks later Mr. Khalilian threatened to "make [him] disappear" if he didn't stop spending so much time with Mr.

Lee. *Id.* at \P 7. Mr. Gomes is particularly stressed and afraid because Mr. Khalilian does indeed know where he lives. *Id.* at \P 8.

Dave Augusto is an independent contractor whose mission is to get investment money to improve Monster as a company. *See* Declaration of Dave Augusto ("Augusto Decl."), ¶ 2. What did he get in return? First, Mr. Khalilian recounted a story about the time the FBI was investigating him for the murder of a young woman who was chopped up into 20 pieces, and this was in front of Mr. Augusto and the investors he went out of his way to bring in. *Id.* at ¶ 6. Was Mr. Khalilian distraught about the murder? No, no. Instead, his only comment was, "Why 20 pieces? Do 40 pieces!" *Id.*

Not one to rest on his laurels, just several weeks ago Mr. Khalilian upped the ante by yelling over the phone at Mr. Augusto that he'd "better run" because he was going to kill him and his family. *Id.* at ¶ 8.

Even Mr. Lee's dedicated Executive Assistant Ashley Elliott hasn't escaped Mr. Khalalian's wrath. On May 7, 2018, Ms. Elliott received a telephone call from Mr. Khalilian in which he first screamed obscenities at her, and then yelled, "Get away from Noel, or I will destroy you and make your life a living hell." *See* Declaration of Ashley Raye Elliott ("Elliott Decl."), ¶ 6. Ms. Elliott was so concerned that Mr. Khalilian might actually harm her, that she documented the phone call in her journal. *Id.* at Ex. A.

Amir Shafi, at the time Monster's Chief Technology Officer, was also subjected to Mr. Khalilian's "cut up pieces of body in a bag" story, along with five other Monster employees.

It was in October 2017, and the group was out in Las Vegas to explore closing down Monster's distribution facility there. *See* Declaration of Amir Shafi ("Shafi Decl."), ¶ 7. After becoming angry that the local staff didn't take more aggressive action over some thefts, he told the group, "There was a girl who accused me of rape, I was acquitted. But her body was found a few weeks later in a few bags." *Id.* at ¶ 10. Mr. Shafi felt threatened by the events, not only for himself, but also his family. *Id.* at ¶ 11. Importantly, Mr. Shafi feels that working under such conditions is "stressful." *Id.*

Being Mr. Lee's son, it is not surprising that Kevin Lee has also suffered more than his fair share of Mr. Khalalian's harassment and threats. One notable memory was the time Mr. Khalilian called Mr. Kevin Lee on July 13, 2018 while he was on vacation. *See* Declaration of Kevin Lee ("Lee Decl."), at ¶ 5. Mr. Khalilian explained that he was again having problems with Kevin's father, and said "I'm going to have to go after your dad, and I will have to go after you, too." *Id.*

At first Mr. Kevin Lee wasn't sure what to make of Mr. Khalilian's threats and harassment, and thought he was just referring to financial issues. *Id.* at ¶ 6. But after considering all of the threats and harassment, on himself and others, including his handicapped father, Mr. Kevin Lee firmly views Mr. Khalilian's threats as credible, and believes he is capable of physical violence. *Id.*

Attachment 5a

Bronne

Noel Lee founded Monster in 1978, and has been Chief Executive ever since. Lee Decl., ¶
1.) Mr. Lee met Fred Khalilan approximately one year ago through a mutual friend. *Id.* at ¶ 4.

Soon thereafter, Mr. Lee brought Mr. Khalilan into the company as interim Chief Operating
Officer. *Id.* at ¶ 5.

Employee Ashley Elliott began working at Monster in August 2017, and is the Executive Assistant to Mr. Lee. Elliott Decl., at ¶ 1. Shortly after starting work at Monster, Mr. Lee introduced Ms. Elliott to Mr. Khalilan, and explained that he was the new interim COO. *Id.* at ¶ 2.

Employee Lucas Gomes was hired as Sales Manager at Monster in May 2018. Gomes Decl., at ¶ 1. Mr. Gomes met Mr. Khalilan during his initial hiring process, when Mr. Khalilan took him to lunch for an informal interview. *Id.* at ¶ 2. Mr. Gomes eventually reported to Fred after getting hired. *Id.*

Independent contractor Amir Shafi first worked at Monster from 2009 to 2017, first as IT Director, and was later promoted to Chief Technical Officer. Shafi Decl., *Id.* at ¶ 1. Mr. Shafi left the company in late 2017, but returned approximately one week ago as an independent contractor to provide IT consulting. Shafi Decl., *Id.* ¶ 2. Mr. Shafir first met Mr. Khalilan towards the end of his first stint at Monster, in approximately June 2017, when Mr. Lee brought him around the office and introduced him as the interim Chief Operating Officer. *Id.* at ¶ 3. Noel explained that Mr. Khalilan's primary mission was to bring in investments to Monster. *Id.*

Independent contractor Corey Dee Llewellyn owns a digital marketing company that provides marketing and branding services for companies in the music business and beyond, including for Monster. Llewellyn Decl., at ¶ 1. Mr. Llewellyn was introduced to Mr. Khalilan in approximately July 2017, and eventually had further contact in connection with a potential investor that Mr. Llewellyn and his partners presented to Monster. *Id.* at ¶¶ 3,4.

Dave Augusto is an independent contractor who provides brokerage services to Monster. Agusto Decl., at ¶ 1. In that position, Mr. Augusto sees himself as a financial "match-maker," connecting potential investors to Monster. *Id.* at ¶ 2. In early July 2018, Mr. Augusto told Mr.

Lee that he had an investor interested in learning more about Monster. Id. at ¶ 3. Mr. Lee in turn introduced Mr. Augusto to Mr. Khalilan, who he said was the new interim COO, and would handle such matters. Id.

Kevin Lee is the son of founder and CEO Noel Lee. Kevin L. Decl., at ¶ 2. Mr. Kevin Lee initially worked at Monster from 2004 to 2010, and then returned in October 2017. *Id.* at ¶ 1. He is currently the Vice President of Brand and Corporate Development. *Id.* Mr. Kevin Lee first learned of Mr. Khalilan in August 2017, before he had returned to the company. *Id.* at ¶ 3. Mr. Kevin Lee said that some current and former Monster employees contacted him to complain about Mr. Khalilan, and to warn him and his father. *Id.*

ATTACHMENT 5b

-

As can be seen from the facts presented in this Petition, and supporting Declarations, MR. Khalilian's behavior went from bad to worse in his short stint at Monster. Most concerning were the increasing credible, and violent, threats in recent months against both employees and independent contractors.

The most serious recent credible threats of physical violence by Mr. Khalilian were against independent contractors Corey Llewellyn and David Augusto, and Monster Sales Manager Lucas Gomes. *See* Llewlyn Decl., ¶ 5; Augusto Decl., ¶ 8; Gomes Decl., ¶ 7. It was determined that not only was Mr. Khalilian poisoning the company and trying to force out CEO Noel Lee, he was a legitimate danger to the employees and independent contractors. Ironically, those very same employees and contractors simply love music and want to have fun — that's why they work at Monster!

Mr. Khalilian had also recently exhibited increasing hostility towards Noel Lee, who is nearly 70 years old, handicapped, and unable to walk. Things came to a head on the afternoon of July 14, 2018, when Mr. Khalilial distributed an email to Mr. Lee and 14 other Monster employees that was clearly designed to disparage and embarrass him. Lee Decl., ¶ 9, Ex. A. In specific, Mr. Khalilian's email stated in part: "By you keep insulting me behind my back and telling everyone and saying you don't believe I have any deals Everything you all did and all the directions you wear going was lost lost lost...." *Id.* Mr. Lee responded at length, but most importantly, he told Mr. Khalilan he was "out of line." *Id.*

Given the totality of the circumstances, particularly with respect to the threats of violence and harassment detailed later in this Petition, it was determined to terminate Mr. Khalilian.

Concurrent with the filing of this Petition, corporate counsel for Monster is taking the appropriate legal steps to terminate Mr. Khalilian's employment with Monster. Lee Decl., ¶ 5.

ATTACHMENT 8c

It's difficult to know where to start with this saga. So many Monsters were subjected to serious threats of physical violence by Mr. Khalilian, forced to listen to his stories of when he was allegedly under investigation by the FBI for murdering and cutting up a young woman, pervasive harassment, and crude, boorish behavior.

But we must start with Noel Lee, who founded Monster in 1978 and has made running the company his life. Lee Decl., ¶ 1, 11. Indeed, Noel's title is, "Headmonster." Monster, headquartered in South San Francisco, is in the business of designing, manufacturing, and selling hardware associated with enjoying music, most notably high-end headphones and cables. *Id.* at ¶¶ 2-3.

Noel first met Mr. Khalalian, Respondent in this matter, approximately one year ago through a mutual friend, singer/songer-writer Sean Kingston. Lee Decl., ¶ 4. Noel was initially impressed with Mr. Khalilian, as he claimed to have the ability to bring Monster lucrative business, in particular with respect to online Indian gaming. *Id.* Mr. Khalilian furthermore claimed to have the ability to procure significant investments in Monster from various sources, including Mexican billionaire Carlos Slim. *Id.*

Thus, Noel brought Mr. Khalilian into the company as interim Chief Operations Officer. Id. at ¶ 4. But things quickly soured. Soon after assuming the position of interim COO, Noel learned from various sources that Mr. Khalilian was disparaging him behind his back, including claiming that he was unfit to continue running Monster. Id. Noel also heard that Mr. Khalilian had threatened employees. Id.

Now, it is important to note as we go forward with this story that while Mr. Khalilian is a young man in his 40's, Noel is approaching 70 years old, handicapped, and unable to walk. *Id.* at ¶¶ 11-12. This makes Mr. Khalilian's reprehensible behavior, as detailed in this Petition and supporting declarations, all the more egregious.

Sometime in late 2017, Noel was riding in the backseat in a car with one of his employees, Eva King. *Id.* at ¶ 6. During the drive, Noel recalls that Mr. Khalilian called Eva, and she placed

ATTACHMENT & TO MONSTER'S PETITION FOR WORKPLACE RESTRAINING ORDER

him on speaker phone. *Id.* Noel wasn't paying close attention to the phone call, but he noticed that after the call had ended, Eva was extremely distraught, nearly in tears. *Id.* Noel asked her what was wrong, and she told him that Mr. Khalilian had threatened to "beat her up," and that Mr. Khalilian said, "if you weren't a woman, I would cut off your legs." *Id.*On another conference call several months ago, Mr. Khalilian threatened employee

Jesus Campos with physical violence right in front of Noel. *Id.* at ¶ 7. Noel recalls that another Monster employee named James Takanuchi was also on the line. *Id.*Jesus works in Monster's IT department, and Noel recalls Mr. Khalilian was angry with

Jesus works in Monster's IT department, and Noel recalls Mr. Khalilian was angry with Jesus over an email problem he was experiencing. *Id.* Mr. Khalilian yelled at Jesus, "If you don't get me on this email, I am going to fuck you up!" *Id.*

Noel himself has also been personally subject to threats from Mr. Khalilian. Noel recalls he was at his condominium at the Cosmopolitan Hotel in Las Vegas several months ago with one of his assistants, Lucas Gomes. *Id.* at ¶ 8. Mr. Khalilian called sometime in the early part of the day, and Noel put him on speakerphone. *Id.* Mr. Khalilian was angry about an issue he was having with the sales team, and yelled, "I can push a button and make you disappear!" *Id.*

Things came to a head at Monster the afternoon of July 14, 2018, when Mr. Khalilian distributed an email to Noel and 14 other Monsters that plainly disparaged him. See Lee Decl. at Ex. A. In specific, Mr. Khalilian's email stated in part: "By you keep insulting me behind my back and telling everyone and saying you don't believe I have any deals Everything you all did and all the directions you wear going was lost lost lost...." Id. Noel responded at length, but most importantly, he wrote that Mr. Khalilian he was "out of line." Id.

Noel believes Mr. Khalilian is capable of physical violence, and thinks his threats are credible. *Id.* at ¶ 11. As mentioned earlier, Noel is handicapped and unable to walk, and is nearly 25 years older than Mr. Khalilian. He is, therefore, particularly vulnerable to Mr. Khalilian's threats and harassment. *Id.*

Mr. Khalilian's constant threats and hostile behavior almost from the moment he joined Monster has taken a toll on Noel personally and emotionally. *Id.* at ¶ 12.

Running Monster is Noel's life, and Mr. Khalilian's actions have caused Noel and many of his employees and friends great stress and sadness. *Id*.

As a result of all of the harassment, outside counsel for Monster is taking the appropriate legal steps to terminate Mr. Khalilian's employment with Monster concurrent with this filing. *Id.* at ¶ 10

Much of Mr. Khalilian's recent threats and harassment appears linked to a potential investment from a Hong Kong investment firm that never came to fruition.

The deal was initially introduced by Dave Augusto, who has worked at AU Capital Partners on behalf of Monster since approximately 2016. Augusto Decl., ¶ 1. AU Capital Partners is a brokerage firm, and Dave's primary mission with respect to Monster is to raise capital for them. *Id.* at ¶ 2. Dave considers himself a financial "match maker", introducing potential investors to Monster. *Id.*

In early July 2018, Dave identified a Hong Kong investment bank that was interested in learning more about Monster, and contacted Noel to discuss the matter. *Id.* at ¶ 3. Noel introduced Dave to Mr. Khalilian, and said he was the new Monster interim Chief Operating Officer. *Id.*

Dave arranged a meeting between Mr. Khalilian and the Hong Kong investment bankers at the Montage Hotel in Beverly Hills on the evening of July 3, 2018, and also attended. *Id.* at ¶ 4. Dave immediately knew he had made a mistake in setting up the meeting. *Id.* at ¶ 5.

Dave does not recall Mr. Khalilian's precise words, but he said that Noel was no longer fit to be CEO of Monster, and that he, Mr. Khalilian, should be in charge. *Id.* Dave recalls that Mr. Khalilian's speaking pattern was erratic and rambling, and then became concerning. *Id.* at ¶ 6.

Things took a turn for the worse. Mr. Khalilian announced to the entire group that he had previously been investigated by the FBI for the murder of a young woman who had been found "chopped into 20 pieces." *Id.* Dave recalls that Mr. Khalilian asked the group, "why 20 pieces? Do 40 pieces!" *Id.* Dave felt uncomfortable, to say the least, and other participants at the meeting were texting him while Mr. Khalilian was still speaking, expressing their concerns. *Id.* The

meeting ended soon thereafter.

Dave followed-up with Mr. Khalilian by texting him and speaking with him by phone twice after the meeting. *Id.* at ¶ 7. Mr. Khalilian told Dave that he had traveled to China to again meet with the Hong Kong investment group, but that they had no money. *Id.*

Up until that point, Mr. Khalilian had not expressed any anger towards Dave, which is why Dave was surprised that on Sunday, July 15, 2018, at approximately 3:46 p.m., Mr. Khalilian called him on his cellphone and sounded "different." *Id.* at ¶ 8. David said Mr. Khalilian was "agitated," and sounded like he was possible intoxicated or on drugs. *Id.*

Mr. Khalilian became angry, and yelled, "You better call off your boys....You don't know me! You don't know what I've done to people." *Id.* Dave responded that he could not control what happens with the investment bankers. *Id.*

Mr. Khalilian replied, "Your families are not safe. You tell your boys to fucking run. I go all over the world, you better fucking run! I will kill you and your family, and CL's family!" Id. Mr. Khalilian then hung up. Dave understood that Mr. Khalilian's reference to "CL" was to Dave's colleague, Corey "CL" Llewellyn. Id.

Dave took Mr. Khalilian's threats as credible, and his comments put him in fear for his life and the life of his family. *Id.* at ¶ 9. Accordingly, on the afternoon of July 21, 2018, Dave responded to the Monrovia Police Department and filed a Criminal Threats report. *Id.* Dave has not yet received the final report yet, but is willing to provide it to the Court when he obtains it. *Id.*

Corey Llewellyn got similar treatment from Mr. Khalilian over the Hong Kong investment issue. Corey is the owner of Digiwax Media, a company that provides marketing and branding services for musicians and other corporate ventures, including to Monster. Llewellyn Decl., ¶ 1.

In approximately July 2017, Noel introduced Corey to Mr. Khalilian, who Noel stated was Monster's new interim Chief Operating Officer. *Id.* at ¶ 3. In early July 2018, Corey told Mr. Khalilian of a firm that was potentially interested in investing in Monster. *Id.* at ¶ 4. Corey arranged for Mr. Khalilian to meet with the investors in Los Angeles, and he participated in the meeting by telephone. *Id.* The brief meeting was uneventful, and Mr. Khalilian and the investors

agreed to continue discussions at a later date. Id.

On July 13, 2018, Corey telephoned Mr. Khalilian to learn how the negotiations were proceeding with the investment company. *Id.* at ¶ 5. Mr. Khalilian became irate, raising his voice and shouted expletives. *Id.* He yelled at Corey, "I am going to fucking kill you! You'd better run! I am going to kill your family! You want to see how crazy I am?" *Id.* The entire phone call lasted less than two minutes before Corey hung up the phone. *Id.*

In response to Mr. Khalilian's threats to Corey and his family, he sent him an email on July 15, 2018, at approximately 2:00 p.m. See Llewellyn Decl., Ex. A. His email stated in part, "I take threats on my life and my families very seriously. Not only is it unprofessional but it is also criminal." Id.

Corey believes Mr. Khalilian's threats are credible, and the death threats made Corey fear for his life and the life of his family members. Id. at \P 6.

Lucas Gomes witnessed Mr. Khalilian's harassment and threats on his very first day working at Monster. Lucas started working as a Sales Manager at Monster in May 2018. Gomes Decl., ¶ 1. He first met Mr. Khalilian during the hiring process, when he had an informal interview at a restaurant with Mr. Khalilian, and later reported to him after getting hired. *Id*.

On his first day of working at Monster, Lucas was with Noel at his condominium at the Cosmopolitan Hotel in Las Vegas. *Id.* at ¶ 3. At approximately 10:00 p.m., Mr. Khalilian called the room, and Noel placed him on speakerphone. *Id.* at ¶ 4. Mr. Khalilian was angry, and yelled at Noel, "Look, you cock sucker. If I want to see the sales team, I will see the sales team. You fucking cock sucker, shut the fuck up. I can press one button and end you." *Id.* Noel and Mr. Khalilian argued and swore at each other before Noel hung up the phone. *Id.*

It wasn't long before Lucas became a target himself. At the end of May 2018, he was driving to Mr. C's Hotel in the afternoon to see Noel when a Monster employee named James rang his cellphone. *Id.* at ¶ 5. James said that Mr. Khalilian wanted to speak with Lucas, and then James patched Mr. Khalilian into the call. *Id.*

When Mr. Khalilian came on the phone, he told Lucas, "Listen, and listen close. I am only going to say this one more time. Stay away from Noel Lee. I didn't hire you to change Noel's dirty diapers. He is sick and old. You don't want to be around him. I have been building this company up, and no one person is going to stop that from happening, and it definitely won't be you. This is my last time telling you. Trust me, I don't give second chances. Allison, right?" *Id.* at ¶ 6.

A Monster employee named Allison, who had apparently been on the call without Lucas' knowledge, said, "Right." *Id.* at ¶ 7. Mr. Khalilian said, "Georgia, right?" *Id.* Georgia, also a Monster employee, chimed in on the conference call, "That's right." *Id.*

Mr. Khalilian said to Lucas, "I will make you disappear if you don't stay away from Noel Lee. Am I clear? Don't make me repeat myself." *Id.* Because he wanted to get off the call, he responded, "Ok, fine," and ended the call. *Id.*

Lucas takes Mr. Khalilian's threat seriously, and believes he is capable of actually carrying out his threats and harming or killing him. *Id.* at ¶ 8. Lucas believes Mr. Khalilian's threats are credible both from his demeanor, and also from his violent and shady past that Lucas discovered by searching his name on Google. *Id.* Moreover, Mr. Khalilian knows where Lucas lives, as he was the one who provided Lucas with his employment contract, which lists his home address, and also has access to Lucas' employee records. *Id.* All of this causes Lucas emotional stress. *Id.*

The hostility Lucas suffered from Mr. Khalilian seems to fit into a pattern: get too close to Noel, and you're a target. Noel's Executive Assistant, Ashley Elliott, learned this the hard way.

Ashley has worked at Monster since approximately August 2017. Elliott Decl., ¶ 1.

5 6

4 10

11 12

13 14

16 17

15

18 19

20 21

22 23

24

25 26 27

28

Shortly after beginning work at Monster, Noel introduced Ashley to Mr. Khalilian, who he said was Monster's new interim Chief Operating Officer. Id. at ¶ 2.

Almost immediately after assuming the role of COO, Ashley noticed that Mr. Khalilian was with Noel nearly every day. Id. at ¶ 2. Mr. Khalilian also began discouraging Ashley from associating too frequently with Noel, and told her directly on more than one occasion that she should not spend time with Noel outside of work. Id.

When Ashley refused to heed Mr. Khalilian's ridiculous directive, things turned ugly. On the afternoon of May 7, 2018, Ashley was staying at the Cosmopolitan Hotel in Las Vegas, where Noel owns a condominium. Id. at ¶ 3. She received a call on her cell phone from Mr. Khalilian, who was irate and screamed obscenities at her. Id. Mr. Khalilian yelled, "get away from Noel, or I will destroy you and make your life a living hell! And keep Lucas away from Noel, or I will destroy him, too." Id. In order to end the call as fast as possible, Ashley replied, "I hear you. I understand," and then got off the call. Id.

Ashley soon learned what extreme danger Mr. Khalilian posed for Noel. On May 21, 2018, Ashley was again at the Cosmopolitan Hotel in Las Vegas, and getting breakfast at the buffet. Id. at ¶ 5. Mr. Khalilian approached her, and she observed him to be intoxicated, with slurred speech and was unsteady on his feet. Id. Mr. Khalilian pulled her aside and whispered, "If Noel fucks me out of the company, I will kill him and turn myself in. This is the kind of shit that's on CNN." Id.

Ashley was so concerned that she immediately told her friend Marco Tavares about the incident, who was staying with them at the Cosmopolitan Hotel. Id. To further document and

3

4

5

6

Q

11

13

15

16

17

18

19

20

21

22

23

24

25

26

27

28

memorialize the threats, and because she took them so seriously, Ashley documented both of the incidents in a journal she maintains. See Elliott Decl., Ex. A. Being the son of Noel, Kevin Lee of course suffered his own fair share of abuse and threats from Mr. Khalilian. Having previously worked at Monster for many years before departing for other career opportunities, Kevin returned in October 2017 and is the Senior Vice President of Brand and Corporate Development. Kevin Lee Decl., ¶ 1. Kevin first learned of Mr. Khalilian in approximately August 2017, before he had returned to Monster. Id. at ¶ 3. Several people, both current and former employees of Monster, contacted 10 Kevin to voice concerns with Mr. Khalilian's attitude and erratic personality. Id. In specific, 12 several people said Mr. Khalilian was "isolating" Kevin's father, and also disparaging him behind his back. Id. Furthermore, several people told Kevin they had conducted Google searches of Mr. 14 Khalilian's name, and found concerning things about his background. Id. Sometime in May or June 2018, Kevin had a phone conversation with he believes Ashley Elliott, who is his father's assistant. Id. at ¶ 4. Ashley said that Mr. Khalilian had threatened Kevin's dad with physical violence. Id. Sometime after that, Kevin was on a phone call with Mr. Khalilian, and raised the issue of him threatening his father. Id. Mr. Khalilian said, "Yeah, that's the kind of person I am. Your dad is messing with my livelihood." Id. Kevin replied, "Do what you gotta' do to protect your wealth, but I hope you wouldn't physically harm my dad." Id. Mr. Khalilian did not respond. Id. On another occasion, Mr. Khalilian called Kevin's cellphone on the morning of July 13. 2018. Id. at ¶ 5. Kevin recalls the date because he was on vacation at the Russian River at the

time. Id. Mr. Khalilian explained that he was again having problems with Noel, and said, "I'm going to have to go after your dad, and I will have to go after you, too." Id.

At first Kevin took Mr. Khalilian's threats as more of a financial issue. *Id.* at ¶ 6. But the more Kevin has learned about Mr. Khalilian and interacted with him, he believe his threats are credible, and that he is capable of becoming physically violent. *Id.*

The people involved with the Hong Kong investment incident weren't the only ones regalled by Mr. Khalilian's story of a young woman found chopped up in many bags.

Amir Shafi previously worked for Monster from June 2009 to December 2017, starting as IT Director and then serving as Chief Information Officer from August 2013 through when he left the company. Shafi Decl., ¶ 1. Even though Amir left Monster in 2017, he remained close friends with Noel, and has remained knowledgeable about the internal dynamics of the company. *Id.* at ¶ 2. Amir is now back with Monster, having started to provide IT consulting services about a week ago. *Id.*

Amir first met Mr. Khalilian in approximately June 2017, when Noel brought him around the office and introduced him as the interim Chief Operating Officer. *Id.* at ¶ 3. Noel explained that Mr. Khalilian's primary mission was to bring in investments to Monster. *Id.*

Within a few weeks of starting at Monster, in approximately July 2017, Mr. Khalilian demanded that Amir provide him full administration access to Monster's entire computer system, including Monster's eCommerce system, as well as the servers. *Id.* at ¶ 4. Mr. Khalilian made these demands of Amir dozens of times in person, over email, and phone calls. *Id.* Mr. Khalilian also demanded the same access for another Monster employee named Allesio Mack. *Id.*

Amir at first refused to grant them that access, because in his opinion it was an entirely inappropriate request – nobody needs full access to Monster's computer systems. *Id.* at ¶ 5. Mr. Khalilian was unhappy with that response, and threatened both in person and over email to replace Amir's team with IT people he knew from Miami. *Id.*

In about the July/August 2018 time frame, Amir asked Mr. Khalilian both in person and

over emails why he needed full Admin access. *Id.* at ¶ 6. Mr. Khalilian was not able to provide an adequate explanation, other than to say he "wanted full control over the systems." *Id.* Amir eventually relented, and granted him Admin access, but asked a third party website hosting firm to keep a log and monitor activity to ensure no damage was done. *Id.*

Part of Amir's concern with Mr. Khalilian stemmed from his increasingly erratic and concerning behavior. *Id.* at ¶ 7. Amir recalls one meeting he attended at Monster's former Las Vegas distribution center that occured on October 27, 2017. *Id.* Also in attendance were Monster employees Mr. Khalilian, Noel Lee, Marco Padilla, Stan Kelman, Cheryl Mulconrey, and a former CFO named Felix. *Id.*

The purpose of the meeting was to explore shutting down the facility, and handing over the distribution function to a third party. *Id.* at ¶ 8. Amir recall that Mr. Khalilian became angry at Stan Kelman, because the deal wasn't getting done fast enough. *Id.* Mr. Khalilian also berated Stan because they discovered that the security company on site may have been stealing from the distribution facility, but nothing had been done about it. *Id.*

Mr. Khalilian asked why they had not called the police on the matter. *Id.* at ¶ 9. Cheryl, who at the time was the Head of Monster HR, explained that they tried, but the Las Vegas Police said they were too busy. *Id.* Mr. Khalilian yelled at Cheryl, "You don't know how to deal with law. I know how to deal with law. The way to deal with law enforcement in Vegas is to call the cops and say, 'I am going to shoot this guy for stealing from me." *Id.*

Mr. Khalilian continued yelling at the entire group, "There was a girl who accused me of rape, I was acquitted. But her body was found a few weeks later in a few bags." *Id.* at ¶ 10. Amir was personally terrified and in shock at Mr. Khalilian's statement, but said nothing. *Id.* Amir looked around at the group, who also appeared shocked and were silent. *Id.*

Amir feels threatened by Mr. Khalilian's remarks, both for his family and for himself. *Id.* at ¶ 11. It is Amir's belief that "anything is possible" from people who act like Mr. Khalilian, especially his actions that day in Las Vegas. *Id.* Amir feels that working under such conditions is stressful. *Id.*

ATTACHMENT 8d

-

Many of the targets of Mr. Khalilian's threats are emotionally damaged, stressed, and in fear for their own safety and the safety of their families.

Noel Lee himself has been profoundly impacted by this entire experience. Mr. Lee founded Monster in 1978, and it has been his entire life. Lee Decl., ¶ 12. He brought Mr. Khalilian into the company with only the best intentions, believing he could bring in investment money, and be instrumental in an online Indian gaming venture. Id. at ¶ 4. Instead, Mr. Lee has been subjected to threats against himself and his beloved employees. And Mr. Lee is particularly vulnerable to these threats, given he is almost 70 years old, handicapped, and cannot walk, while Mr. Khalilian is a young man in his 40's. Id. at ¶ 11.

Mr. Lee takes the threats seriously, and believes Mr. Khalilian is capable of physical violence. *Id.* at ¶ 11. All of these threats and harassment has taken a toll on Mr. Lee both personally and emotionally. *Id.* at \P ¶ 12.

And can you imagine what Kevin Lee has gone through? Watching as his elderly father is threatened and harassed by a man who his father was kind enough to bring into the family business? At one point, after hearing that Mr. Khalilian had threatened his father, Kevin Lee confronted him and said, "I hope you wouldn't physically harm my dad." Kevin Lee Decl., ¶ 4. Nobody should have to live like that, particularly since Kevin Lee believes those threats to be credible and thinks Mr. Khalilian is capable of actually becoming violent. *Id*.

Mr. Augusto takes Mr. Khalilian's threats very seriously, and is in fear for his own life, and also for the lives of his family. Augusto Decl., \P 9. Mr. Augusto took the threats so seriously that he responded to the Monrovia Police station to file a report and seek protection. *Id*.

After Mr. Khalilian threatened Mr. Llewellyn and his family, Mr. Llewellyn was compelled to fire back in an email dated July 15, 2018, in which he tells Mr. Khalilian in part, "I take threats on my life and my families very seriously. Not only is it unprofessional but it is also criminal." Llewellyn Decl., Ex. A. Mr. Llewellyn also states in his email that he has notified various friends that if he or his family are harmed, that Mr. Khalilian should be implicated given

his threats. Id. Mr. Llewellyn essentially now lives in fear.

Ms. Elliott took similar measures in response to Mr. Khalilian's threats. Mr. Khalilian had previous told Ms. Elliott to "stay away from Noel" or he would "destroy" her and "make [her] life a living hell." Elliot Decl., ¶ 3. On a later occasion, Mr. Khalilian told Ms. Elliott that if Noel Lee "fucks" him out of the company, he would kill him. *Id.* at ¶ 5. Ms. Elliott was so stressed by these threats that she documented them in her journal in case Mr. Khalilian actually carried through. *See* id., Ex. A.

Mr. Shafi, one of the lucky few to be exposed to Mr. Khalilian's favorite "young girl cut into many pieces" story feels that "anything is possible" when it comes to him and his threats. Safi Decl., ¶¶ 10-11. As a result, Mr. Safi feels threatened and says that working under these conditions is "stressful." *Id*.

And can you imagine what Kevin Lee has gone through? Watching as his elderly father is threatened and harassed by a man who his father was kind enough to bring in? At one point, after hearing that Mr. Khalilian had threatened his father, confronted him and said, "I hope you wouldn't physically harm my dad." Kevin Lee Decl., ¶ 4. Nobody should have to live like that, particularly since Kevin Lee believes those threats to be credible and thinks Mr. Khalilian is capable of actually becoming violent. *Id*.

ATTACHMENT 12

California Code of Civil Procedure section 527.6(d) provides in pertinent part that, "A temporary restraining order may be issued with or without notice, based on a declaration that, to the satisfaction of the court, shows reasonable proof of harassment of the petitioner by the respondent, and that great or irreparable harm would result to the petitioner."

Good cause exists in the instant matter to excuse Petitioner from providing notice to Respondent of its intent to seek a Temporary Restraining Order due to the high likelihood that further threats of violence, or even actual violence, would occur had notice been given.

Concurrent with the filing of this Petition, corporate counsel for Monster is taking action to terminate Mr. Khalilian, as well as several other employees, at Monster's headquarters in San Francisco. Lee Decl., ¶ 10. The plan of action includes stripping Mr. Khalisian of all access to Monster's computer and financial systems. Noel Lee, other Monster executives, as well as outside counsel and security elements will be on hand, all of whom could be injured had Mr. Khalisian had advanced notice of Monster going to court to seek a restraining order barring him from coming near Monster's corporate headquarters.

It is clear from the evidence put forth in this Petition, and supporting Declarations, that Mr. Khalisian's behavior has become more erratic and violent in recent months. In specific:

- Only two weeks ago, on July 13, 2018, Mr. Khalalian yelled at Monster independent contractor Corey Llewellyn over the phone that he was going to "fucking kill" him, and also "kill your family!" See Declaration of Corey Dee Llewellyn ("Llewellyn Dec."), ¶ 5.
- During a meeting in early July 2018, Mr. Khalisian recounted a story to Dave Augusto and a group of potential Monster investors about the time the FBI was investigating him for the murder of a young woman who was chopped up into 20 pieces. Augusto Decl., 6. Mr. Khalilian showed no remorse for the murdered victim, but rather commented, "Why 20 pieces? Do 40 pieces!" Id.
- Then on July 15, 2018, Mr. Khalilian yelled at Mr. Augusto over the phone that

ATTACHMENT 4b TO MONSTER'S PETITION FOR WORKPLACE RESTRAINING ORDER

he'd "better run" because he was going to kill him and his family. Id. at \P 8. Mr. Augusto was so distraught he responded to the Monrovia Police Department to file a Criminal Threats police report. Id. at \P 0.

- Mr. Khalisian has told Noel Lee, nearly 70 years old and unable to walk, that he
 could make him "disappear with the push of a button!" Lee Decl., ¶ 8.
- In May of 2018, Mr. Khalisian told Mr. Gomes that he would "make [him] disappear" if he didn't stop spending so much time with Mr. Lee. Gomes Decl., ¶ 7.

There are scores of other examples of threats of violence and harassment, but the above demonstrates without question that Mr. Khalisian is a dangerous person, and great care is needed to protect those involved with carrying out the various tasks associated with his removal from the company.

One only need to look at Mr. Khalisian's criminal history to see he is capable of actual violence. Filed herewith is Petitioner's Request for Judicial Notice of court records from Florida reflecting that Mr. Khalisian had been "Adjudicated Guilty" on three separate incidents of misdemeanor battery, and pleaded "Nolo Contendre" to a fourth incident of misdemeanor battery.

The risks were simply too high to provide notice, and Petitioner respectfully requests that the Court issue a TRO pending a full hearing on the merits in order to ensure the safety of Monster and its employees.

Exhibit Y

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573134898040@s.whatsapp.net Julio Salazar
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 14243026161@s.whatsapp.net Fbi International
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Mauricio do you have the paperwork for the Range Rover because tomorrow morning we're gonna go to DIAN or do you need to grab it out of the dashboard

Participant	Delivered	Read	Played
573134898040@s.whatsapp.net Julio Salazar	5/23/2023 11:31:32 PM(UTC+0)	5/23/2023 11:31:38 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	5/23/2023 11:31:32 PM(UTC+0)	5/23/2023 11:32:19 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	5/23/2023 11:31:34 PM(UTC+0)	5/24/2023 3:15:51 AM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	5/23/2023 11:31:32 PM(UTC+0)	5/23/2023 11:31:38 PM(UTC+0)	
14243026161@s.whatsapp.net Fbi International	5/23/2023 11:31:35 PM(UTC+0)	5/23/2023 11:56:52 PM(UTC+0)	
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	5/23/2023 11:31:32 PM(UTC+0)	5/23/2023 11:40:48 PM(UTC+0)	

Status: Read Platform: Mobile

Source Info: iiPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AA5E9 (Table: ZWAMESSAGE; Size: 84033536 bytes) iiPhone (732)/mobile/Containers/Shared/ChatStorage.sqlite: 0x29AA5E9 (Table: 732)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AA5E9 (Table: 732)/mobile/Containers/Shared/AppGroup/group.gr

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl ist: 0x2C1D (Size: 39391 bytes) ist: 0x2C1D (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Yes sir Status: Read Platform: Mobile

5/23/2023 11:32:23 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x29AA555 (Table: ZWAMESSAGE; Size: 84033536 bytes)

innone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

My lord, tomorrow Mrs. Sonia Uribe will attend to you directly. Who is the director of the dian in Antioquia? They have even offered us to receive the cars in the private parking lot; of the ports through which their vehicles have entered and has been made available for any requirement that you may need. San also offered the legal support that you require for not only your cars, but anything else that you need matters and they will attend you with all the pleasure when you require it.

Status: Read Platform: Mobile

5/24/2023 12:05:51 AM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AA068 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

GOVERNMENT **EXHIBIT**

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 100 of 105

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573134898040@s.whatsapp.net Julio Salazar
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director
To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D
To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin
To: 14243026161@s.whatsapp.net Fbi International
To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Good morning I'm getting ready Camilo from Larry bikes he's pretending that he fix the problem for us now my question is was if you guys you and Fabiano's contact or is it really him we're going to go down to DIAN's office anyway to show our face and show some respect I'm also bringing some cash with me so we can give them. It's important so I'm getting ready. I'm gonna send you a copy the message you sent me you tell me what do you think it's going on I'll be ready in 30 minutes.

Participant	Delivered	Read	Played
573134898040@s.whatsapp.net Julio Salazar	5/24/2023 4:14:09 PM(UTC+0)	5/24/2023 4:39:56 PM(UTC+0)	
573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director	5/24/2023 4:14:10 PM(UTC+0)	5/24/2023 4:14:19 PM(UTC+0)	
573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security D	5/24/2023 4:14:10 PM(UTC+0)	5/24/2023 4:30:12 PM(UTC+0)	
573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin	5/24/2023 4:14:09 PM(UTC+0)	5/24/2023 4:14:14 PM(UTC+0)	
14243026161@s.whatsapp.net Fbi International	5/24/2023 4:14:11 PM(UTC+0)	5/24/2023 4:21:49 PM(UTC+0)	
573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director	5/24/2023 4:14:09 PM(UTC+0)	5/24/2023 4:14:12 PM(UTC+0)	

Status: Read Platform: Mobile

5/24/2023 4:14:08 PM(UTC+0)

Source Info: iPhone (232)

Source Info:
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AC58E (Table: ZWAMESSAGE; Size: 84033536 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.pl
ist: 0x2C1D (Size: 33931 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlite: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner) To: 573134898040@s.whatsapp.net Julio Salazar To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin To: 14243026161@s.whatsapp.net Fbi International To: 573195878661@s.whatsapp.net Fabian Galeano/ Medellin Asst Security Director

Attachments:



Size: 109921
File: 109921
File: name: eec0ff36-4bd5-4dee-8d84-a573d91d1bf5.jpg
Path: https://mmg.whatsapp.net/o1fv/t62.7118-24/f1/m239/up-oil-image-7d357501f62b-4c39-9717-d37df2c07448?ccb=94&oh=01_AdTndaEll7Xiopl7qysYSOEg5HgmzUGy5H6rmwCtZO1Ryw&oe=6495C405
&mms3=True

eec0ff36-4bd5-4dee-8d84-a573d91d1bf5.jpg

Participant	Delivered	Read	Played
573134898040@s.whats app.net Julio Salazar	5/24/2023 4:14:29 PM(UTC+0)	5/24/202 3 4:39:56 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	5/24/2023 4:14:29 PM(UTC+0)	5/24/202 3 4:14:29 PM(UTC	

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 101 of 105

573173698994@s.whats 5/24/2023 app.net Nelson 4:14:30 Vasqus/Medelin Security PM(UTC+0) 4:30:12 PM(UTC +0) 573003105943@s.whats 5/24/2023 app.net Veronica Gaviria 4:14:29 New Security Medellin PM(UTC+0 14243026161@s.whatsa 5/24/2023 pp.net Fbi International 4:14:31 PM(UTC+0) 4:21:49 PM(UTC +0) 573195878661@s.whats 5/24/2023 app.net Fabián Galeano/ 4:14:29 Medellin Asst Security PM(UTC+0 Director 4:14:29 PM(UTC+0) 4:15:16 PM(UTC +0)

Status: Read Platform: Mobile

5/24/2023 4:14:25 PM(UTC+0)

Source Info: iPhone

iPnone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x29AC4DE (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Riz/Riz.colit.

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

IFTIONE
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2
.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)
iPhone
(2001e-bits/Containers/Character)

I-none (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/M edia/120363146137425770@g.us/e/e/eec0ff36-4bd5-4dee-8d84-a573d91d1bf5.jpg: (Size: 100021 bustes) 109921 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Okay Sir, I am finding out what Camilo did, but it is very separate from the management that we are doing.

Status: Read Platform: Mobile

5/24/2023 4:18:54 PM(UTC+0)

Source Into:
IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AC2F8 (Table: ZWAMESSAGE; Size: 84033536 bytes)
IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 14243026161@s.whatsapp.net Fbi International

I understand let me know

Status: Read Platform: Mobile

5/24/2023 4:22:15 PM(UTC+0)

Source Info:

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x328BE (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner) To: 573134898040@s.whatsapp.net Julio Salazar To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 102 of 105

To: 14243026161@s.whatsapp.net Fbi International To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Attachments:



Size: 109676
File name: e39c983a-9afe-431b-880b-9dfdc9db36c7.jpg
Path: https://mmg whatsapp.net/v/t62.711824/30440364_292072419815294_7719576801047172042_n.enc?ccb=1148ch=01_AdQbaafgYTfOd9S5USZGuOhLQmwk6vGpiJmaD5wOqLYEcg&oe=6495B
355&mms3=true
e39c983a-9afe-431b-880b-9dfdc9db36c7.jpg

Participant	Delivered	Read	Played
573134898040@s.whats app.net Julio Salazar	5/24/2023 4:27:13 PM(UTC+0)	5/24/202 3 4:39:56 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	5/24/2023 4:27:11 PM(UTC+0)	5/24/202 3 4:28:22 PM(UTC +0)	
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	5/24/2023 4:27:11 PM(UTC+0)	5/24/202 3 4:30:12 PM(UTC +0)	
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	5/24/2023 4:27:11 PM(UTC+0)	5/24/202 3 4:27:17 PM(UTC +0)	
14243026161@s.whatsa pp.net Fbi International	5/24/2023 4:27:11 PM(UTC+0)	5/24/202 3 4:27:15 PM(UTC +0)	
573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security Director	5/24/2023 4:27:11 PM(UTC+0)	5/24/202 3 4:27:14 PM(UTC +0)	

Status: Read Platform: Mobile

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x29ADE38 (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared/Riz/Riz.redit.

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0.x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0.x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/e/3/e39c983a-9afe-431b-880b-9dfdc9db36c7.jpg: (Size: 109676 bytes)

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 103 of 105

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

My lord, I was finding out how everything happened I talked to Camilo and asked how the process he had done had been, he tells me that he only knows what the processor who does the paperwork for him in Bogotá told him the guy called him last night at 8:30 p.m. and told him that the problem had already been solved, but that was after Fabián had already made the calls through Bogotá and Santa Marta, most likely, after the process made by Fabián, the processor he would like to take the opportunity to get his share and he tells Camilo that he had solved the problem, the important thing is that no one is looking for the car anymore and that the problem has a solution regarding the director of the dian here in Antioquia It would be good to visit her for protocol to greet her and get to know each other, but the best thing is not to bring her money, but better to invite her to a dinner or a diff later. but the best thing is not to bring her money, but better to invite her to a dinner or a gift later to avoid perhaps offending her.

Platform: Mobile

5/24/2023 5:20:39 PM(UTC+0)

Source Info

iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AE1A4 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 16504073547@s.whatsapp.net Prince Fred K. (owner)
To: 573134898040@s.whatsapp.net Julio Salazar
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

To: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security Medellin

Medellin To: 14243026161@s.whatsapp.net Fbi International To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst

I understand and I'm getting ready

Participant	Delivered	Read	Played
573134898040@s.whats app.net Julio Salazar	5/24/2023 5:21:39 PM(UTC+0)	5/24/202 3 5:21:43 PM(UTC +0)	
573054043996@s.whats app.net Mauricio Pine/ Medellin Security Director	5/24/2023 5:21:40 PM(UTC+0)	5/24/202 3 5:21:49 PM(UTC +0)	
573173698994@s.whats app.net Nelson Vasqus/Medelin Security D	5/24/2023 5:21:39 PM(UTC+0)	5/24/202 3 5:21:39 PM(UTC +0)	
573003105943@s.whats app.net Veronica Gaviria New Security Medellin	5/24/2023 5:21:39 PM(UTC+0)	5/24/202 3 5:21:48 PM(UTC +0)	
14243026161@s.whatsa pp.net Fbi International	5/24/2023 5:21:41 PM(UTC+0)	5/24/202 3 5:23:53 PM(UTC +0)	
573195878661@s.whats app.net Fabián Galeano/ Medellin Asst Security Director	5/24/2023 5:21:40 PM(UTC+0)	5/24/202 3 5:21:45 PM(UTC +0)	

Platform: Mobile

5/24/2023 5:21:38 PM(UTC+0)

Source Info: iPhone

.: 1331/2006/il/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29AFC5F (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Pref erences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 104 of 105

4:48:04 PM(UTC +0)

573195878661@s.whats app.net Fabian Galeano/ Medellin Asst Security

5/25/2023 4:48:04 PM(UTC+0)

5:08:45 PM(UTC +0)

Status: Read Platform: Mobile

5/25/2023 4:48:00 PM(UTC+0)

Source Info: iPhone

IPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorag e.sqlite: 0x29BA340 (Table: ZWAMESSAGE, ZWAMEDIAITEM; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared/Library/Preferences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes) iPhone (232)/webile/Containers/Shared/Preferences/group.net.whatsapp.WhatsApp.shared.plist: 0x2C1D (Size: 39391 bytes)

irinine (232)/mebile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Biz/Biz.sqlit e: 0x54464 (Table: ZWABIZVERIFIEDNAME; Size: 405504 bytes)

(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2 .sqlite : 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes) iPhone

infolie (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770@g.us/c/5/c5344c72-00c1-4fee-9ea0-890607b77000.jpg: (Size: 80846 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

my lord, Mrs. Sonia has already been notified of the emails, and the equipment is already ready

Status: Read Platform: Mobile

5/25/2023 5:08:56 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29BCC1D (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

[25/5 12:17 p. m.] Sonia Uribe DIAN: Mi correo es suribev@dian.gov.co [25/5 12:18 p. m.] Sonia Uribe DIAN: Dile que también lo envíe a Cpaniaguac@dian.gov.co

Status: Read Platform: Mobile

5/25/2023 5:19:04 PM(UTC+0)

Source Info: iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29BCA2C (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

my lord she also has these emails that are active

Status: Read Platform: Mobile

5/25/2023 5:19:49 PM(UTC+0)

Source Info:

| Information |

0X2900300 (Table: ZVYAMIDOOGS, Sizz. XVIIII iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

Case 2:23-cr-00222-RFB-NJK Document 17-1 Filed 12/19/23 Page 105 of 105

Forwarded

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:5c03ff1d-2bb9-3c85-a9d5-3c7f417700f9

Status: Read Platform: Mobile Label: Forwarded

5/25/2023 5:26:32 PM(UTC+0)

Elphone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29BC6AB (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

Mrs. Sonia tells me that this is the information corresponding to the import under the diplomatic concept in case you want them to enter that way

Status: Read Platform: Mobile

5/25/2023 5:28:00 PM(UTC+0)

Source Info: iPhone (232

Source Info: (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite: 0x29BC587 (Table: ZWAMESSAGE; Size: 84033536 bytes) iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5 (Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)

From: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security Director

JIMMY GRAPHICS 300 3036622

https://maps.app.goo.gl/hEKeBPJS911w8VbA6

Attachments:



Title: JIMMY GRAPHICS · Cra 43G #26-41, El Poblado, Medellín, El Poblado, Medellín, Antioquia Size: 5804

Size: 5804 File name: - Diseñador gráfico Path: https://maps.app.goo.gl/hEKeBPJS911w8VbA6 - Diseñador gráfico

Status: Read Platform: Mobile

5/25/2023 9:48:11 PM(UTC+0)

Source Info:
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ChatStorage.sqlite:
0x29C0355 (Table: ZWAMESSAGE, ZWAMESSAGEDATAITEM, ZWAMEDIAITEM; Size: 84033536 bytes)
iPhone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/ContactsV2.sqlite: 0x9A8A5
(Table: ZWAADDRESSBOOKCONTACT; Size: 1110016 bytes)
iPhone
(232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Messane/Media/1203631461374257

rmone (232)/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/120363146137425770 @g.us/1/d/1d77596e-6071-4235-9908-169626d6415f.thumb:(Size: 5804 bytes)

To: 573134898040@s.whatsapp.net Julio Salazar
To: 573054043996@s.whatsapp.net Mauricio Pine/ Medellin Security

Fo: 573173698994@s.whatsapp.net Nelson Vasqus/Medelin Security

To: 573003105943@s.whatsapp.net Veronica Gaviria New Security

Medellin To: 14243026161@s.whatsapp.net Fbi International To: 573195878661@s.whatsapp.net Fabián Galeano/ Medellin Asst Security Director

Stay in the car

95